

# Development Control A Committee Agenda



**Date:** Wednesday, 26 April 2023

**Time:** 2.00 pm

**Venue:** The Council Chamber - City Hall, College Green, Bristol, BS1 5TR

Members of the public attending meetings or taking part in Public Forum are advised that all Development Control meetings are filmed for live or subsequent broadcast via the council's webcasting pages. The whole of the meeting is filmed (except where there are confidential or exempt items) and the footage will be available for two years.

If you ask a question or make a representation, then you are likely to be filmed and will be deemed to have given your consent to this. If you do not wish to be filmed you need to make yourself known to the webcasting staff. However, the Openness of Local Government Bodies Regulations 2014 now means that persons attending meetings may take photographs, film and audio record the proceedings and report on the meeting (Oral commentary is not permitted during the meeting as it would be disruptive). Members of the public should therefore be aware that they may be filmed by others attending and that is not within the council's control.

**Councillors:** Richard Eddy (Chair), John Geater, Paul Goggin, Fi Hance, Tom Hathway, Philippa Hulme, Farah Hussain, Ed Plowden and Andrew Varney

**Issued by:** Allison Taylor, Democratic Services

City Hall, PO Box 3399, Bristol, BS1 9NE

E-mail: [democratic.services@bristol.gov.uk](mailto:democratic.services@bristol.gov.uk)

**Date:** Tuesday, 18 April 2023



# Agenda

## 1. Welcome, Introductions and Safety Information

(Pages 5 - 8)

## 2. Apologies for Absence and Substitutions

## 3. Declarations of Interest

To note any interests relevant to the consideration of items on the agenda. Please note that any declarations of interest made at the meeting which are not on the register of interests should be notified to the Monitoring Officer for inclusion.

## 4. Minutes of the previous meeting

To agree the minutes of the last meeting as a correct record.

(Pages 9 - 13)

## 5. Action Sheet

The Committee is requested to note any outstanding actions listed on the rolling Action Sheet for DCA Committee.

(Page 14)

## 6. Appeals

To note appeals lodged, imminent public inquiries and appeals awaiting decision.

(Pages 15 - 27)

## 7. Enforcement

To note recent enforcement notices.

(Page 28)

## 8. Public Forum

Up to 30 minutes is allowed for this item.

Any member of the public or Councillor may participate in Public Forum. The detailed arrangements for so doing are set out in the Public Information Sheet at the back of this agenda. Public Forum items should be emailed to



[democratic.services@bristol.gov.uk](mailto:democratic.services@bristol.gov.uk) and please note that the following deadlines will apply in relation to this meeting:-

Questions - Written questions must be received 3 clear working days prior to the meeting. For this meeting, this means that your question(s) must be received in this office at the latest by 5 pm on **20 April 2023**.

Petitions and Statements - Petitions and statements must be received on the working day prior to the meeting. For this meeting this means that your submission must be received in this office at the latest by 12.00 noon on **25 April 2023**.

**PLEASE NOTE THAT IN ACCORDANCE WITH THE NEW STANDING ORDERS AGREED BY BRISTOL CITY COUNCIL, YOU MUST SUBMIT EITHER A STATEMENT, PETITION OR QUESTION TO ACCOMPANY YOUR REGISTER TO SPEAK.**

In accordance with previous practice adopted for people wishing to speak at Development Control Committees, please note that you may only be allowed **1 minute** subject to the number of requests received for the meeting.

## 9. Planning and Development

(Page 29)

- a) **22/02737/F & 22/02889/LA - Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA** (Pages 30 - 822)
- b) **22/03476/F - The Vassall Centre Gill Avenue Bristol BS16 2QQ**

## 10. Date of Next Meeting

2pm 31 May 2023



# Public Information Sheet

## Inspection of Papers - Local Government (Access to Information) Act 1985

You can find papers for all our meetings on our website at [www.bristol.gov.uk](http://www.bristol.gov.uk).

## Public meetings

Public meetings including Cabinet, Full Council, regulatory meetings (where planning and licensing decisions are made) and scrutiny will now be held at City Hall.

Members of the press and public who plan to attend City Hall are advised that you may be asked to watch the meeting on a screen in another room should the numbers attending exceed the maximum occupancy of the meeting venue.

## COVID-19 Prevention Measures at City Hall (June 2022)

When attending a meeting at City Hall, the following COVID-19 prevention guidance is advised:

- promotion of good hand hygiene: washing and disinfecting hands frequently
- while face coverings are no longer mandatory, we will continue to recommend their use in venues and workplaces with limited ventilation or large groups of people.
- although legal restrictions have been removed, we should continue to be mindful of others as we navigate this next phase of the pandemic.

## COVID-19 Safety Measures for Attendance at Council Meetings (June 2022)

We request that no one attends a Council Meeting if they:

- are required to self-isolate from another country
- are suffering from symptoms of COVID-19 or
- have tested positive for COVID-19

## Other formats and languages and assistance for those with hearing impairment

You can get committee papers in other formats (e.g. large print, audio tape, braille etc) or in community languages by contacting the Democratic Services Officer. Please give as much notice as possible. We cannot guarantee re-formatting or translation of papers before the date of a particular meeting.

Committee rooms are fitted with induction loops to assist people with hearing impairment. If you require any assistance with this please speak to the Democratic Services Officer.



## Public Forum

Members of the public may make a written statement ask a question or present a petition to most meetings. Your statement or question will be sent to the Committee Members and will be published on the Council's website before the meeting. Please send it to [democratic.services@bristol.gov.uk](mailto:democratic.services@bristol.gov.uk).

The following requirements apply:

- The statement is received no later than **12.00 noon on the working day before the meeting** and is about a matter which is the responsibility of the committee concerned.
- The question is received no later than **5pm three clear working days before the meeting**.

Any statement submitted should be no longer than one side of A4 paper. If the statement is longer than this, then for reasons of cost, it may be that only the first sheet will be copied and made available at the meeting. For copyright reasons, we are unable to reproduce or publish newspaper or magazine articles that may be attached to statements.

By participating in public forum business, we will assume that you have consented to your name and the details of your submission being recorded and circulated to the Committee and published within the minutes. Your statement or question will also be made available to the public via publication on the Council's website and may be provided upon request in response to Freedom of Information Act requests in the future.

We will try to remove personal and identifiable information. However, because of time constraints we cannot guarantee this, and you may therefore wish to consider if your statement contains information that you would prefer not to be in the public domain. Other committee papers may be placed on the council's website and information within them may be searchable on the internet.

### During the meeting:

- Public Forum is normally one of the first items on the agenda, although statements and petitions that relate to specific items on the agenda may be taken just before the item concerned.
- There will be no debate on statements or petitions.
- The Chair will call each submission in turn. When you are invited to speak, please make sure that your presentation focuses on the key issues that you would like Members to consider. This will have the greatest impact.
- Your time allocation may have to be strictly limited if there are a lot of submissions. **This may be as short as one minute.**
- If there are a large number of submissions on one matter a representative may be requested to speak on the groups behalf.
- If you do not attend or speak at the meeting at which your public forum submission is being taken your statement will be noted by Members.
- Under our security arrangements, please note that members of the public (and bags) may be searched. This may apply in the interests of helping to ensure a safe meeting environment for all attending.



- As part of the drive to reduce single-use plastics in council-owned buildings, please bring your own water bottle in order to fill up from the water dispenser.

For further information about procedure rules please refer to our Constitution <https://www.bristol.gov.uk/how-council-decisions-are-made/constitution>

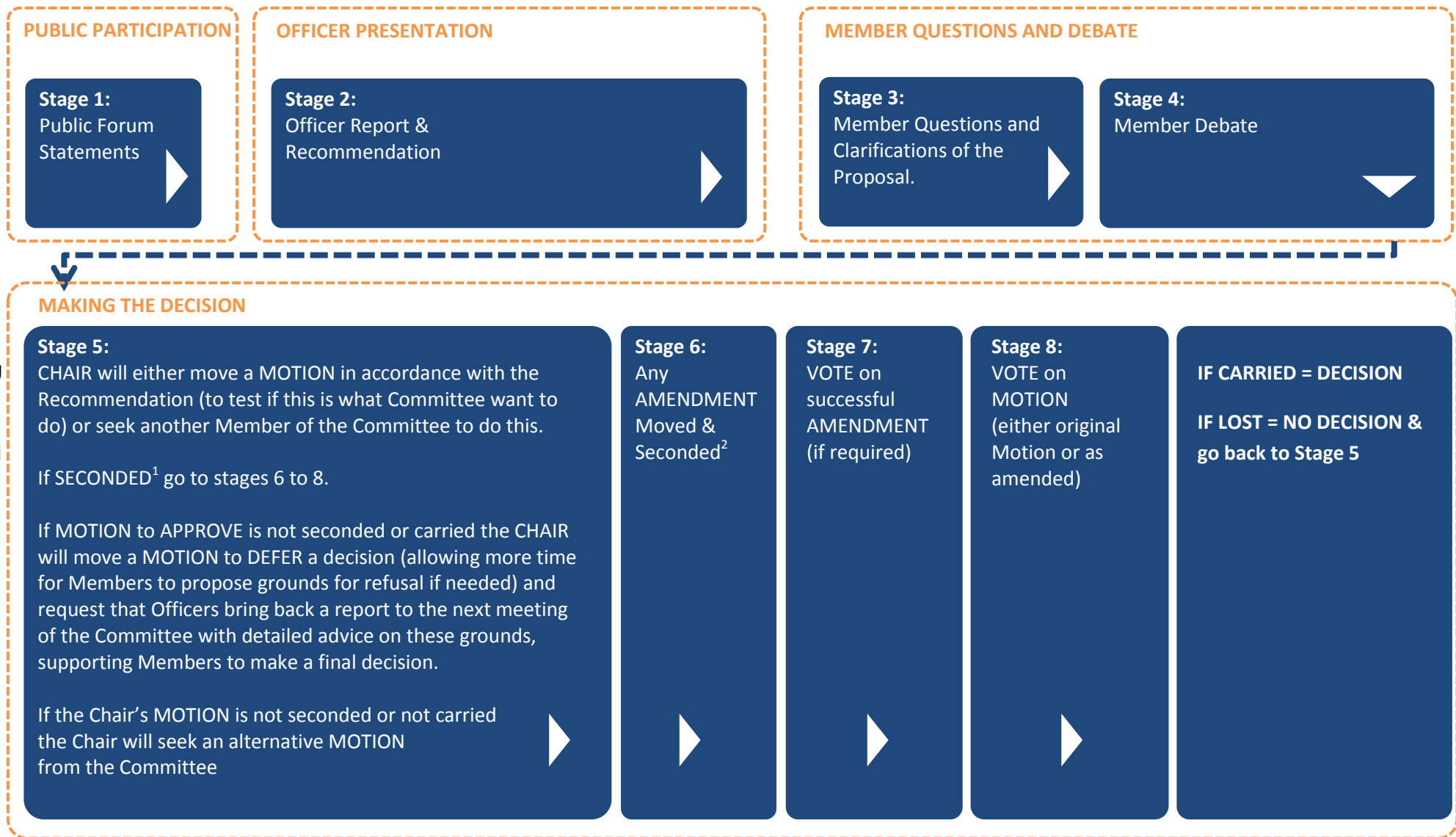
### Webcasting/ Recording of meetings

Members of the public attending meetings or taking part in Public forum are advised that all Full Council and Cabinet meetings and some other committee meetings are now filmed for live or subsequent broadcast via the council's [webcasting pages](#). The whole of the meeting is filmed (except where there are confidential or exempt items). If you ask a question or make a representation, then you are likely to be filmed and will be deemed to have given your consent to this. If you do not wish to be filmed you need to make yourself known to the webcasting staff. However, the Openness of Local Government Bodies Regulations 2014 now means that persons attending meetings may take photographs, film and audio record the proceedings and report on the meeting (Oral commentary is not permitted during the meeting as it would be disruptive). Members of the public should therefore be aware that they may be filmed by others attending and that is not within the council's control.

The privacy notice for Democratic Services can be viewed at [www.bristol.gov.uk/about-our-website/privacy-and-processing-notice-for-resource-services](http://www.bristol.gov.uk/about-our-website/privacy-and-processing-notice-for-resource-services)



# Development Control Committee Debate and Decision Process



Page 7

<sup>1</sup> A Motion must be Seconded in order to be formally accepted. If a Motion is not Seconded, the debate continues

<sup>2</sup> An Amendment can occur on any formally approved Motion (ie. one that has been Seconded) prior to Voting. An Amendment must itself be Seconded to be valid and cannot have the effect of negating the original Motion. If Vote carried at Stage7, then this becomes the Motion which is voted on at Stage 8



## Public Document Pack

### Bristol City Council Minutes of the Development Control A Committee

21 December 2022 at 6pm



#### **Members Present:**

**Councillors:** Richard Eddy (Chair), Paul Goggin, Fi Hance, Farah Hussain, John Geater, Tom Hathway, Philippa Hulme, Ed Plowden, Andrew Varney

**Officers in Attendance:** Gary Collins – Head of Development Management, Relevant Case Officers, relevant Transport Development Officers, Steve Gregory – Democratic Services

#### **1. Welcome, Introductions and Safety Information**

All parties were welcomed to the meeting.

#### **2. Apologies for Absence and Substitutions.**

No apologies received, committee noted that Councillor Farah Hussain arrived after the meeting had commenced and was not present during public forum business or the start of the officer introduction to the report for agenda item 9a and so was unable to take part in the debate and decision for that item.

#### **3. Declarations of Interest.**

Councillor Geater declared an interest in agenda item 9a, Footway Bridge, as this was in his electoral ward, and although he had actively worked for the opening and restoration of the footbridge, he came to the meeting without a decision in mind.

#### **4. Minutes of the previous meeting held on 16 November 2022.**

**Resolved – That the minutes of 16 November 2022 be agreed as a correct record and signed by Councillor Eddy.**

#### **5. Action Sheet.**

Councillor Eddy confirmed that DC A Committee's lead members had been consulted on the Colston Yard draft Construction Management Plan. A number of comments had been made to the case officer and lead members were broadly in favour of it.





## 6. Appeals

The appeals report was noted.

## 7. Enforcement.

There were two notices, both were noted accordingly. Arising from a question the Head of Development Management explained that there was 28-day window for compliance before any legal action was taken. If the notices were appealed against then this would appear on the next appeal report. If not, then each notice would be required to be complied with.

Noted that HMOs had a longer period to comply, and the planning enforcement team would also take into consideration the impact on tenants, this would mean looking at the tenancy agreement with a view to matching enforcement action with it to minimize the impact on tenants. If compliance failed, then the next step would be to apply to the Magistrate Court for a prosecution. This was a lengthy and sometimes costly process, but in these circumstances, it would be the only option open to the enforcement team.

## 8. Public Forum

Members of the Committee received Public Forum Statements in advance of the meeting.

The Statements were heard before the application they related to and were taken fully into consideration by the Committee prior to reaching a decision.

## 9. Planning and Development

The Committee considered the following applications.

### 9a 22/02249/FB & 22/01149/LA : Footway Bridge Over Kings Weston Road Bristol

Councillor Farah Hussain did not take part in the debate or decision for this application.

An Amendment Sheet was provided to the Committee in advance of the meeting, detailing changes since the publication of the original report.

The Officer summarized the report as follows:

The applications had been brought to the Committee due to the significance of the proposal to the entire city.

The purpose of the applications was to secure the repair and reinstatement of the iron Kings Weston footbridge and reduce the risk of vehicle traffic damage to the listed structure in the future.

The footbridge had been struck by an HGV in 2015, resulting in a section of the bottom rib on the north-east side being damaged. The bridge was closed to the public and a scaffold was erected to support the bridge. In 2017, BCC commissioned CH2M to conduct a Principal Inspection Report and identify a solution to prevent future structure strikes. In April 2018, the bridge was again struck by an HGV, destroying both spandrels on the western side of the bridge and detaching the south-eastern spandrel from the abutment.



The bridge would be reinstalled 1.074m higher than its current level as the required safe headroom for an existing structure, adjusted for the curve of the carriageway and the deflection on the bridge, was 5.49m. New concealed foundations would be installed and dressed in coursed rubble stonework to match adjacent road cutting walls. Steps would be added, 12 on the west side and 9 on the east side. Anti-slip resin step treads would be added to the front of each step.

No alterations would be made to the highway itself and the bridge would be reinstated as a footpath/footbridge and the width of the bridge would not be altered. Noted that the footbridge was not wide enough to comfortably accommodate both pedestrians and cyclists.

The officer recommendation was to approve the applications as it would facilitate the vital repair of an important listed structure and bring a public right of way back into use.

The following points arose from questions and debate:

- Regarding access to the footbridge a ramp was not considered as it was not a realistic option with the land available and would require a large area and a steep approach, it would also be more costly. The steps were also considered to be a more sympathetic option on aesthetic grounds and to comply with heritage aspects.
- Members noted that a previous application for the footbridge had been made in 2019, which had proposed ramps for access, but the land take was considered to cause harm regarding the site's heritage, on the advice of the highway team the application was withdrawn. Although this was not a formal decision this had been formally submitted as an application and had led to the steps option which was supported on heritage grounds.
- A cyclist's rail to assist pushing bikes up steps was not considered for this application as it was for a footbridge and not a cycle track and also for reasons of safety.
- Height restrictions could be emphasized by allowing signage to inform road users, although outside the remit of this application it would be possible to include this as a recommendation via an Advice Note. Noted that the bridge would be raised by 1.074m to avoid further collisions with high vehicles in accordance with new regulations.
- A suggestion to lower the road itself was considered a very expensive option which had not been formally called for and was outside of the remit of the current application.
- Local access groups had been fully consulted on the proposal and where there had been no response these were further chased up, it was emphasized that of the 97 letters sent out the vast majority were in support, with 36 in support and only 2 objections.
- Regarding Historic England's (HE) request for a s106 agreement to rebuild the bridge, members were advised that as BCC was the applicant it was not possible to have a legal agreement with itself, the best that could be achieved was a memorandum of understanding between BCC and HE.

Having regard to all the comments made Councillor Eddy moved that the applications be granted subject to an advice note regarding road signage about the height of the footbridge, this was seconded by Councillor Goggin.



On being put to the vote there were 8 for, none against and no abstentions.

**RESOLVED – That the applications be granted subject to the conditions as set out in the report and the inclusion of an advice note regarding road signage about the height of the footbridge.**

### **9b 22/00805/F – 155-165 West Street Bedminster Bristol**

The application was referred to Committee due to the significant public interest it had received and was heard at Development Control Committee A on the 16 November 2022. The item was then deferred for Officers to further report on the suitability of student accommodation at the location of the development.

The scope of the update report was therefore limited to the matter of the location of the development and should be read in conjunction with the previous committee report. The recommendation made to Members was the same as the previous report, namely that the application be recommended for approval subject to a s.106 Agreement and conditions.

The Case Officer summarized the report as follows:

- Planning permission was sought to demolish existing buildings at the site, to facilitate the construction of student accommodation (19no. flats: 12no. studios, 7no. cluster flats) and a replacement employment unit Use Class E(g). The existing site was composed of a vehicle repair workshop and a car showroom.
- The development had been questioned on the grounds of student accommodation being located outside of the city centre, the proposal's location was also a key concern expressed by Members at the November Committee.
- The application complied with the general criteria of policy DM2 and would not harm the amenity and character of the locality, and nor would it create or contribute to a harmful concentration of student uses within the locality.
- The redevelopment site was on a brownfield site in an accessible location close to good public transport routes and the sustainable nature of the site's location was also recognised by the Council's future plan-making approach for South Bristol.
- The proposal met the expectations of policy BCS18, as it would help to diversify the housing stock in the area and adapt to a changing population where student numbers were expected to rise.
- The proposal would also reduce pressure on existing housing stock and contribute to Bristol's housing supply.
- Concerns about unacceptable levels of on-street car parking in the locality had been reviewed by Transport Development Management and it had been confirmed that there was sufficient capacity in the locality to safely accommodate any car parking associated with the development. A management plan had been provided to give reassurances to local residents regarding noise and disturbance.

The application was recommended for approval, subject to a s.106 Agreement and conditions.

The following points arose from questions and debate:



- Regarding affordable housing currently there was no policy about affordable rents for student accommodation however this would be considered during the Local Plan review.
- The West Street Neighbour Group was not involved at the original consultation stage as it was an informal self-serve group, not a listed formal designated group, such groups were not routinely notified in advance.
- Regarding the flat roof space for solar panels and the possibility for more to be included to reduce co2 output, members were informed that the target in the policy was for a 20% co2 reduction. With the developer's current proposal for heat pumps and solar panels they had already achieved a 38.4% reduction in co2 so it was not possible to insist on a higher standard, however the developer could be requested to provide more.
- Regarding active frontages the developer had done enough for an active frontage and had met design expectations.
- The building could perhaps be repurposed for other types of accommodation in the future such as a typical residential flat, but it was not possible to comment on the structural aspects of this at the current time.
- Space standards for students was not a consideration for this application but in future it was expected that space standards would be drawn up via national policy and SPG's. Also, the new local plan could consider this, consultations for the Local Plan would commence next year.
- On street parking and noise issues had been fully considered and a survey showed that there were 21 spaces available and the highest estimated figure regarding this development was 15 vehicles. A quality management plan, including 24/7 contact lines, would help mitigate noise issues and this had been successfully demonstrated on other similar developments.

Having regard to the comments made Councillor Eddy moved, seconded by Councillor Varney, that the application be granted subject to Conditions and a s106 agreement.

On being put to the vote there were 8 for and 1 against.

**RESOLVED – That the application be approved subject to Conditions and a s106 agreement.**

## **10. Date of Next Meeting**

1 February 2023 at 2pm (This meeting was subsequently cancelled).

The meeting ended at 7.10 pm

**CHAIR** \_\_\_\_\_



## Action Sheet – Development Control Committee A

Date of Meeting	Item/report	Action	Responsible officer(s)/Councillor	Action taken / progress
21/12/22	Enforcement	Annual benchmarking report to DC comparing performance with other core cities would be useful. This was agreed.	Head of DM	GC to provide verbal update at 26 April meeting
No further DCA Committee Meetings Held Since December 2022				

No further DCA Committee Meetings Held Since December 2022

## DEVELOPMENT CONTROL COMMITTEE A

**26 April 2023**

### REPORT OF THE DIRECTOR: DEVELOPMENT OF PLACE

#### LIST OF CURRENT APPEALS

##### Householder appeal

Item	Ward	Address, description and appeal type	Date lodged
1	Lockleaze	22 Elmcroft Crescent Bristol BS7 9NF Single storey rear extension. Appeal against refusal Delegated decision	02/02/2023
2	Ashley	The Cottage 28 Ashfield Place Bristol BS6 5BF Retention of enclosed roof terrace. Appeal against refusal Delegated decision	16/02/2023

##### Informal hearing

Item	Ward	Address, description and appeal type	Date of hearing
3	Lawrence Hill	11 - 17 Wade Street Bristol BS2 9DR Outline application for the demolition of buildings and erection of student accommodation, with access, layout and scale to be considered. Appeal against non-determination	19/04/2023

##### Written representation

Item	Ward	Address, description and appeal type	Date lodged
4	Brislington West	515 - 517 Stockwood Road Brislington Bristol BS4 5LR Outline application for the erection of a five-storey building comprising 9no. self-contained flats, with Access, Layout and Scale to be considered at part of the outline application. Appeal against refusal Delegated decision	10/12/2021

5	Brislington West	Wyevale Garden Centre Plc Bath Road Brislington Bristol BS31 2AD Enforcement notice appeal for hardstanding. (C/22/3306445). Appeal against an enforcement notice	04/10/2022
6	Brislington West	Wyevale Garden Centre Plc Bath Road Brislington Bristol BS31 2AD Enforcement notice appeal for builders yard. (C/22/3306441). Appeal against an enforcement notice	04/10/2022
7	Brislington West	Wyevale Garden Centre Plc Bath Road Brislington Bristol BS31 2AD Enforcement notice appeal for bunds & portable buildings. (C/22/3306446). Appeal against an enforcement notice	04/10/2022
8	Brislington West	Wyevale Garden Centre Plc Bath Road Brislington Bristol BS31 2AD Enforcement notice appeal for plant equipment. (C/22/3306444). Appeal against an enforcement notice	04/10/2022
9	Lockleaze	36 Stothard Road Bristol BS7 9XL Enforcement Notice enforcement for the erection of detached building in garden without planning permission. Appeal against an enforcement notice	17/10/2022
10	Bishopston & Ashley Down	21 Oak Road Bristol BS7 8RY Change of use from residential dwellinghouse (Use Class C3) to a House in Multiple Occupation (HMO) for up to 6 residents (Use Class C4), with associated cycle and refuse/recycling storage. Appeal against non-determination Committee	25/10/2022
11	Bishopsworth	Land To Rear Of 44 & 46 Wrington Crescent Bristol BS13 7EP Construction of 2no. three bedroom semi-detached dwellings. Appeal against non-determination	26/10/2022

12	Westbury-on-Trym & Henleaze	10 Rylestone Grove Bristol BS9 3UT Demolition of existing detached house and erection of 6 bedroom replacement detached dwelling with integral garage, associated landscaping and adjusted access. (Self Build). Appeal against refusal Delegated decision	17/11/2022
13	Stoke Bishop	2 Bramble Drive Bristol BS9 1RE Enforcement notice appeal for front boundary not completed as per plans approved as part of planning permission 21/00431/H and additional planting. Appeal against an enforcement notice	22/11/2022
14	Hillfields	11 The Greenway Bristol BS16 4EZ Erection of two storey, 2 bed detached dwellinghouse, with landscaping and parking. Appeal against non-determination	14/12/2022
15	Cotham	71 Arley Hill Bristol BS6 5PJ Enforcement notice appeal for change of use of the building to large HMO with 8 bedrooms. Appeal against an enforcement notice	15/12/2022
16	Cotham	71 Arley Hill Bristol BS6 5PJ Change of use of the upper floors residential unit from small 6 bedroom HMO C4 to large HMO (Sui Generis Use) for 8 bedrooms (Retrospective). Appeal against refusal Delegated decision	15/12/2022
17	Lockleaze	357 Filton Avenue Bristol BS7 0BD Change of use of existing office (Use Class E) to takeaway (Use Class Sui generis) with the addition of a new extract flue. Demolition of buildings to the rear and the construction of one new building housing 3.no flats over three storeys and associated amenity space, bin and cycle storage. Appeal against refusal Delegated decision	09/01/2023
18	Westbury-on-Trym & Henleaze	65 Henleaze Road Bristol BS9 4JT Change of use of existing ground floor rear storage area to shop unit into 2 bedroomed HMO. Addition of first floor over rear storage area to form 1 bedroomed flat. Appeal against refusal Delegated decision	26/01/2023



19	Southville	20 Mount Pleasant Terrace Bristol BS3 1LF Enforcement notice appeal for change of use to HMO (C4) without planning permission. Appeal against an enforcement notice	01/02/2023
20	Bishopsworth	71 Dangerfield Avenue Bristol BS13 8DX Proposed new dwelling to side. Appeal against refusal Delegated decision	01/02/2023
21	Clifton Down	All Saints Court All Saints Road Bristol BS8 2JE Erection of an additional floor, creating two additional flats. Appeal against refusal Delegated decision	20/02/2023
22	Avonmouth & Lawrence Weston	Land At Rear Of 2 Woodwell Cottages Woodwell Road Bristol BS11 9UP Revised application for planning permission for the erection of residential dwellings, access road, refuse/ recycling stores, cycle parking and ancillary development (Use Class C3). Appeal against non-determination Delegated decision	21/02/2023
23	Southville	Outside 291 North Street Bedminster Bristol BS3 1JP Application to determine if prior approval is required for a proposed development by or on behalf of an electronic communications code operator - Proposed 5G 15m telecoms installation: H3G street pole and additional equipment cabinets. Appeal against refusal Delegated decision	22/02/2023
24	Redland	186 Redland Road Bristol BS6 6YH Retention of stainless steel/glass balustrade, at roof level. Appeal against refusal Delegated decision	03/03/2023
25	Redland	186 Redland Road Bristol BS6 6YH Enforcement notice appeal for an installation of stainless steel/glass balustrade at roof level to form roof terrace without planning permission. Appeal against an enforcement notice	03/03/2023
26	Bedminster	149 West Street Bedminster Bristol BS3 3PN Part change of use from an office to a C3 dwelling unit. Appeal against refusal Delegated decision	31/03/2023

27	Central	2 Clare Street City Centre Bristol BS1 1XR Temporary Static, Illuminated Shroud Advertisement. Appeal against non-determination	04/04/2023
28	Ashley	Dainton Self Storage New Gatton Road Bristol BS2 9SH Proposed 1no. internally illuminated display signboard. Appeal against refusal Delegated decision	04/04/2023
29	Hotwells & Harbourside	2 - 10 Hanover Place Bristol BS1 6XT Window replacement works (all new windows to be uvpc). Appeal against refusal Delegated decision	06/04/2023
30	Westbury-on-Trym & Henleaze	29 Hobhouse Close Bristol BS9 4LZ Retrospective application for retention of dwelling. Appeal against non-determination Committee	06/04/2023
31	Southmead	345 Southmead Road Bristol BS10 5LW Erect 2 bed dwelling. Appeal against refusal Delegated decision	11/04/2023
32	St George Central	20 Grantham Road Bristol BS15 1JR Conversion and extension of existing garage to rear garden to provide additional living accommodation associated to the main dwelling. Appeal against refusal Delegated decision	13/04/2023
33	Hengrove & Whitchurch Park	Bamfield Streetworks Bamfield Bristol BS14 0XD Application to determine if prior approval is required for a proposed telecommunications installation: Proposed 15.0m Phase 8 Monopole C/W wraparound cabinet at base and associated ancillary works. Appeal against refusal Delegated decision	13/04/2023
34	Knowle	318 Wells Road Knowle Bristol BS4 2QG Proposed kitchen extraction from A3 Unit below. Appeal against refusal Delegated decision	13/04/2023

## List of appeal decisions

Item	Ward	Address, description and appeal type	Decision and date decided
35	St George Troopers Hill	42 Nicholas Lane Bristol BS5 8TL A single storey extension is proposed to the rear of the property with a roof terrace accessed from the rear bedroom. Appeal against refusal Delegated decision	Appeal withdrawn 11/01/2023
36	Brislington West	515 - 517 Stockwood Road Brislington Bristol BS4 5LR Outline application seeking matters of Access, Layout, and Scale for the erection of a care complex (Use Class C2). Appeal against refusal Delegated decision	Appeal withdrawn 12/01/2023
37	Eastville	Merchants Arms Bell Hill Bristol BS16 1BQ Change of use from public house (Sui Generis) to mixed use Class F2 (Local Community Uses), Class C3 and Class C4. Appeal against non-determination Delegated decision	Appeal dismissed 21/03/2023  Costs not awarded
38	Henbury & Brentry	Severn House Ison Hill Road Bristol BS10 7XA Window and balcony door replacement scheme for 16 flats. Appeal against refusal Delegated decision	Appeal allowed 18/01/2023
39	Horfield	3 Hunts Lane Bristol BS7 8UW Change of use of existing garage/store to a single 1 bed dwelling (Use Class C3). Appeal against refusal Delegated decision	Appeal dismissed 19/01/2023
40	Westbury-on-Trym & Henleaze	15 Westfield Road Bristol BS9 3HG Demolition of existing buildings and erection of 4no. dwellinghouses, with parking and associated works. Appeal against refusal Delegated decision	Appeal dismissed 10/02/2023
41	Westbury-on-Trym & Henleaze	Land Opposite Car Park Westbury Court Road Bristol BS9 3DF Application to determine if Prior Approval is required for proposed 15.0m Phase 8 Monopole C/W wrapround Cabinet at base and associated ancillary works. Appeal against refusal Delegated decision	Appeal dismissed  14/03/2023

42	Central	40 Baldwin Street Bristol BS1 1NR Erection of a building containing 9 residential flats and office space. Appeal against refusal Delegated decision	Appeal dismissed 27/02/2023  Costs not awarded
43	Central	Rear Of 6 Tyndalls Park Road Bristol BS8 1PY Application for removal or variation of a condition 12 (List of Approved Plans) of permission 20/01279/F - Demolition of boundary wall and construction of a two storey building containing 1no. residential unit with associated provision of amenity space, refuse and cycle storage - revised plans to show the proposed building sitting higher on the site as compared to the consented scheme, given the proposed use of existing foundations. Appeal against refusal Delegated decision	Appeal allowed 15/12/2022
44	Clifton Down	Land At Home Gardens Redland Hill Bristol BS6 6UR Outline planning application for the redevelopment of the site comprising demolition of existing buildings (1-4 Home Gardens, 1-2 The Bungalows and associated garages and outbuildings) and the erection of two new buildings to provide up to 60 residential units (Class C3) (including 20% affordable housing) and up to 262sqm of flexible office space (Class E) to Whiteladies Road frontage and associated works. Permission sought for Access, Scale and Layout). Appeal against refusal Committee	Appeal dismissed 20/03/2023  Split cost decision
45	Bishopston & Ashley Down	229 - 231 Gloucester Road Bishopston Bristol BS7 8NR Erection of a new building to provide 4no. residential flats with refuse/recycling and cycle storage and associated development. Appeal against refusal Delegated decision	Appeal dismissed 16/12/2022
46	Horfield	160 Monks Park Avenue Bristol BS7 0UL Erection of a two bedroom dwelling; with associated vehicular access from Kenmore Drive and pedestrian access from Monks Park Avenue, refuse storage, cycle storage, car parking, provision of private gardens and new landscaping. Appeal against refusal Delegated decision	Appeal dismissed 06/01/2023
47	Frome Vale	Strathmore Pound Lane Bristol BS16 2EP Appeal against High hedge at 4 metres in height in rear garden. Appeal against high hedge	Appeal allowed 29/03/2023

48	Bishopston & Ashley Down	Telecommunication Monopole Junction With Queens Drive And Kings Drive Bristol BS7 8JW Proposed 15 metre tall slim-line, phase 8 monopole c/w wraparound cabinet at base, 3no. additional ancillary equipment cabinets and associated ancillary works. Appeal against refusal Delegated decision	Appeal dismissed 11/01/2023
49	Clifton	The Richmond Building 105 Queens Road Clifton Bristol BS8 1LN Proposed telecommunications Rooftop installation upgrade and associated ancillary works. Appeal against refusal Delegated decision	Appeal allowed 15/12/2022
50	Bedminster	Telecoms Installation Winterstoke Road Bristol BS3 2NW Application to determine if prior approval is required for a proposed 5G telecommunications installation: 15 metre slim line phase 8 monopole c/w wraparound cabinet at base, 3 no. additional ancillary equipment cabinets and associated ancillary works. Appeal against refusal Delegated decision	Appeal allowed 22/12/2022
51	Cotham	38 Chandos Road Bristol BS6 6PF Demolition of 8no. existing garages and construction of 2no. two storey residential dwellings. Appeal against refusal Delegated decision	Appeal dismissed 17/01/2023
52	Bishopston & Ashley Down	37 Maple Road Bishopston Bristol BS7 8RD Change of use from small house in multiple occupation (C4) to a large house in multiple occupation for up to 7 people (sui generis). Appeal against refusal Delegated decision	Appeal dismissed 03/03/2023  Costs not awarded
53	Redland	7 Belvedere Road Bristol BS6 7JG Change of use from 3no. 2-bed flats (Class C3) to a 12-bed extension to the nursing home at 8-9 Belvedere Road (Class C2) (Revised proposal). Appeal against non-determination	Appeal dismissed 30/01/2023

54	Brislington East	Land At Broom Hill/Brislington Meadows Broomhill Road Bristol BS4 4UD Application for Outline Planning Permission with some matters reserved - Development of up to 260 new residential dwellings (Class C3 use) together with pedestrian, cycle and vehicular access, cycle and car parking, public open space and associated infrastructure. Approval sought for access with all other matters reserved. (Major) Appeal against non-determination Committee	Appeal allowed 17/04/2023
55	Avonmouth & Lawrence Weston	8 - 10 Station Road Shirehampton Bristol BS11 9TT Redevelopment of the site to include 18no. houses and 3no. apartments with associated access, parking and landscaping. Appeal against non-determination	Appeal dismissed 05/04/2023
56	Filwood	22 Courtenay Crescent Bristol BS4 1TQ Rear ground floor extension with part first floor bedroom extension and new front porch. Appeal against refusal Delegated decision	Appeal allowed 08/02/2023
57	Knowle	79 Minehead Road Bristol BS4 1BP Two story side & rear extension & single storey front bay / porch and creation of 2 parking spaces to front. Appeal against refusal Delegated decision	Appeal dismissed 31/01/2023
58	Westbury-on-Trym & Henleaze	7 Wildcroft Road Bristol BS9 4HZ First floor extension over present garage. Appeal against refusal Delegated decision	Appeal allowed 20/01/2023
59	Stoke Bishop	14 Mariners Drive Bristol BS9 1QQ Oak frame 1.5 car garage to the front garden. Appeal against refusal Delegated decision	Appeal dismissed 27/01/2023
60	Hartcliffe & Witherwood	50 Hareclive Road Bristol BS13 9JN Retrospective application for boundary wall with adjustments. Appeal against refusal Delegated decision	Appeal dismissed 03/02/2023

61	Henbury & Brentry	<p>Site Opposite Bradbury Court 117 Station Road Henbury Bristol BS10 7QH</p> <p>Application to determine if prior approval is required for a proposed - Proposed telecommunications installation: Proposed 15.0m Phase 8 monopole C/W wrapround cabinet at base and associated ancillary works.</p> <p>Appeal against refusal</p> <p>Delegated decision</p>	<p>Appeal dismissed</p> <p>30/01/2023</p>
62	Hillfields	<p>25 Beaufort Road Speedwell Bristol BS15 1NF</p> <p>Two storey side extension.</p> <p>Appeal against refusal</p> <p>Delegated decision</p>	<p>Appeal allowed</p> <p>10/02/2023</p>
63	Westbury-on-Trym & Henleaze	<p>9 Abbey Road Bristol BS9 3QN</p> <p>One proposed detached dwelling to the side of No. 9 Abbey Road.</p> <p>Appeal against refusal</p> <p>Delegated decision</p>	<p>Appeal allowed</p> <p>23/03/2023</p>
64	Clifton	<p>Granby House Granby Hill Bristol BS8 4LT</p> <p>Replacement of all sash windows of Granby House that were manufactured and installed during 1972-74 on the front (north), side (west) and back (south) elevation with matching style wooden double glazed units and repair window casing and mouldings.</p> <p>Appeal against refusal</p> <p>Delegated decision</p>	<p>Appeal allowed</p> <p>07/03/2023</p>
65	Hillfields	<p>3 Woodland Way Bristol BS15 1QL</p> <p>Loft conversion with a rear/side dormer.</p> <p>Appeal against refusal</p> <p>Delegated decision</p>	<p>Appeal allowed</p> <p>10/02/2023</p>
66	Hengrove & Whitchurch Park	<p>25 Goodwin Drive Bristol BS14 0DR</p> <p>Demolition of existing side extensions and part double story side extension with single story side and rear.</p> <p>Appeal against refusal</p> <p>Delegated decision</p>	<p>Appeal dismissed</p> <p>13/02/2023</p>
67	Lawrence Hill	<p>St Gabriels Court St Gabriels Road Bristol BS5 0RT</p> <p>Change of use of existing commercial building to create 8 no. residential flats (Use Class C3) with parking and associated works.</p> <p>Appeal against non-determination</p>	<p>Appeal allowed</p> <p>29/03/2023</p>

68	Westbury-on-Trym & Henleaze	287 Canford Lane Bristol BS9 3PH Double-storey side extension with single storey rear extension. Appeal against refusal Delegated decision	Appeal allowed 10/02/2023
69	Stockwood	29 Hazelbury Road Bristol BS14 9EP 2 storey side and single storey rear extensions. Appeal against refusal Delegated decision	Appeal dismissed 10/02/2023
70	Stockwood	102 Kinsale Road Bristol BS14 9EZ Remove existing conservatory and re-build as sun room. Appeal against non-determination	Appeal allowed 23/02/2023
71	Southville	8 Acramans Road Bristol BS3 1DQ Change of use from registered nursing home (C2) to a 14-bedroom emergency accommodation unit for up to 20 people (sui generis), including ancillary office. Appeal against non-determination	Appeal dismissed 22/03/2023
72	Lockleaze	34 Lockleaze Road Bristol BS7 9RR Change of use from a dwelling house (C3a) to a large house in multiple occupation for up to 9 people (sui generis). Appeal against non-determination Delegated decision	Appeal allowed 23/02/2023
73	Southmead	Grass Area Near Arnside Road Greystoke Avenue Bristol BS10 5NZ Application to determine if prior approval is required for a proposed telecommunications installation: Proposed 15.0m Phase 9 slimline Monopole and associated ancillary works. Appeal against refusal Delegated decision	Appeal dismissed 02/03/2023
74	Hotwells & Harbourside	1 Ashton Avenue Bristol BS1 6XH Application for Outline Planning Permission - For a single apartment (studio) on the ground floor besides no 1 Ashton Avenue. Approval sought for Access, Landscaping, Layout, and Scale. With all other matter reserved. Appeal against refusal Delegated decision	Appeal dismissed 09/03/2023



75	Filwood	149/149A & Land To Rear Of Marksbury Road Bristol BS3 5LD Demolition of 149A Marksbury Road and erection of 5no. single storey dwellings on land to the rear. Appeal against refusal Committee	Appeal allowed 06/03/2023 Costs awarded
76	Southville	21 Lydstep Terrace Bristol BS3 1DR Proposed loft conversion with rear dormer. Appeal against refusal Delegated decision	Appeal allowed 27/02/2023
77	Cotham	16 Clyde Road Redland Bristol BS6 6RP Demolition of side extension, housing staircase and insertion of new window to side elevation. Creation of access steps/balcony from main entrance level to garden and reconfigure rear garden. Appeal against refusal Delegated decision	Appeal dismissed 01/03/2023
78	Stoke Bishop	53 Shirehampton Road Stoke Bishop Bristol BS9 2DW Proposed two storey side extensions and single storey rear extension. Appeal against refusal Delegated decision	Appeal dismissed 01/03/2023
79	Henbury & Brentry	7 Bidwell Close Bristol BS10 6RJ Proposed new dwelling. Appeal against refusal Delegated decision	Appeal dismissed 06/04/2023
80	Hartcliffe & Witherwood	Telecommunication Mast Opposite 787 Bishport Avenue Bristol BS13 9JQ Application to determine if prior approval is required for a proposed 5G telecoms installation: H3G 16m street pole and additional equipment cabinets. Appeal against refusal Delegated decision	Appeal allowed 06/04/2023
81	Ashley	Telecommunication Mast York Street St Werburghs Bristol BS2 9XS Proposed telecommunications installation: Proposed 15.0m Phase 8 Monopole C/W wrapround Cabinet at base and associated ancillary works. Appeal against refusal Delegated decision	Appeal allowed 06/04/2023

82 Lockleaze

Site Of The Former Piggery Boiling Wells Lane Bristol  
Proposed creation of a new vehicle access from Boiling Wells Lane into the existing site. Installation of a reinforced concrete "bridge" slab to cross over an existing culvert, installation of side railings to slab and a pair of timber gates at the site entrance.

Appeal against non-determination

Delegated decision

Appeal withdrawn  
05/04/2023

## DEVELOPMENT CONTROL COMMITTEE A

26 April 2023

### REPORT OF THE DIRECTOR: DEVELOPMENT OF PLACE

#### LIST OF ENFORCEMENT NOTICES SERVED

Item	Ward	Address, description and enforcement type	Date issued
1	Cotham	18 Alfred Place Kingsdown Bristol BS2 8HD Use of property as small hmo use class c4 without planning permission. Enforcement notice	22/03/2023
2	Hillfields	14 Uplands Road Bristol BS16 4JZ Design and use of detached building in garden not as per LDC BCC ref 21/04452/CP. Enforcement notice	29/03/2023
3	Redland	186 Redland Road Bristol BS6 6YH Installation of stainless steel/glass balustrade at roof level to form roof terrace without planning permission. Enforcement notice	08/02/2023
4	St George West	Garages Naseby Walk Bristol Untidy land and erection of fencing. Enforcement notice	13/02/2023
5	St George West	Garages Naseby Walk Bristol Untidy land and erection of fencing.	13/02/2023

## Development Control Committee A 26 April 2023

### Report of the Director: Economy of Place

#### Index

#### Planning Applications

Item	Ward	Officer Recommendation	Application No/Address/Description
1	Clifton	1. Grant subject to Legal Agreement & 2 Grant	<p>1. 22/02737/F - Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA Redevelopment of site to include 196 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings. (Major)</p> <p>2. 22/02889/LA - Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA Works to listed buildings to facilitate the redevelopment of the site to include 196 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure. Works to listed building including: access-works to the Guthrie Road entrance gates; the conversion of the Entrance Lodge to facilitate community floorspace, the residential conversion of the Giraffe House, and various restoration and refurbishment works to the Aquarium (former Bear Pit), Monkey Temple, and Birds of Prey Aviary to secure their future as part of accessible landscaped gardens.</p>
2	Frome Vale	Grant subject to Legal Agreement	<p>22/03476/F - The Vassall Centre Gill Avenue Bristol BS16 2QQ Demolition of existing buildings and redevelopment of Vassall Centre site to provide housing for older people with associated lounge and communal facilities (Class C2), specialist supported housing for people with learning disabilities (Class C2), re-provision of office space referred to as The Hub (Class E(g)(i)), meeting places for the principal use of the local community (Class F2(b)), a nursery, crèche or day centre (Class E(f)) or non-residential training, employability and education centre (Class F1(a)), a cafe (Class E(b)), landscaping and associated car parking.</p>

WARD: Clifton

SITE ADDRESS: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

APPLICATION NO's: 22/02737/F Full Planning

DETERMINATION DEADLINE: 3 February 2023

**Redevelopment of site to include 196 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings. (Major)**

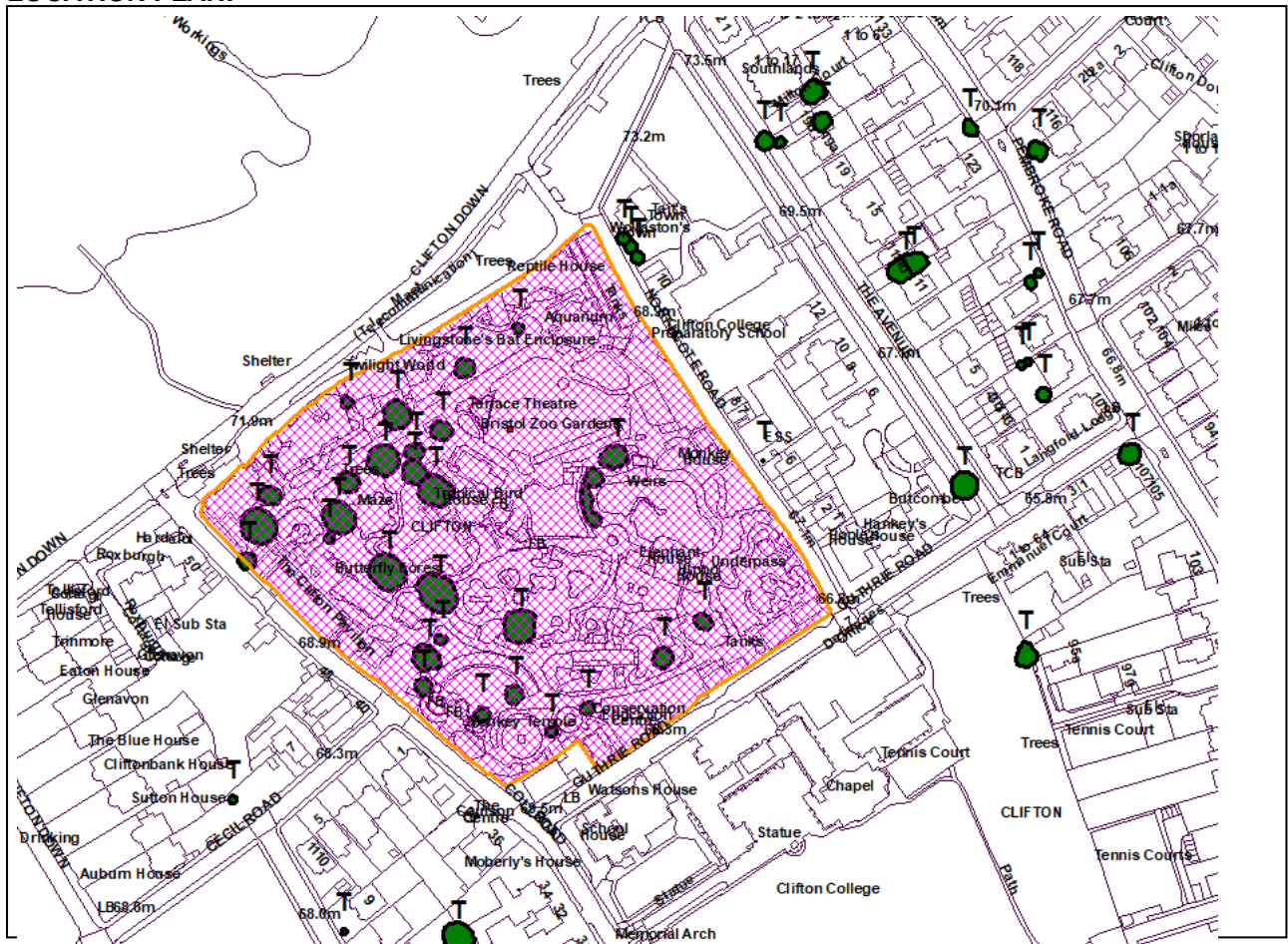
RECOMMENDATION: GRANT subject to Planning Agreement

AGENT: Savills (UK) Limited  
Embassy House  
Queens Avenue  
Bristol  
BS8 1SB

APPLICANT: Bristol, Clifton & West Of England  
Zoological Society Ltd  
Bristol Zoo Gardens  
Guthrie Road  
Bristol  
BS8 3HA

*The following plan is for illustrative purposes only, and cannot be guaranteed to be up to date.*

**LOCATION PLAN:**



**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

## **REASON FOR REFERRAL**

The application is referred to Committee due to the significance of the proposed development and the response the application has received from members of the public.

## **SUMMARY**

Bristol, Clifton and West of England Zoological Society (“the Society” or “the Applicant”) has closed Bristol Zoo Gardens (“the site”), meaning a proposal to re-use or redevelop the site is needed. Accordingly, there is a need to secure a future use, or mix of uses, for the site that can provide the long-term management of the open spaces (including the historic buildings within the landscape). The Applicant has applied for full planning permission to redevelop the site. A mixed use, residential-led development is proposed, which includes 196 residential dwellings, 20% of which are proposed to be affordable homes. The existing Grade II Listed Entrance lodge building will be converted to form the mixed-use, community-focussed hub at the site, including Class E (commercial, business and service), F1 (learning and non-residential institutions) and F2 (local community uses) floorspace - the ‘Clifton Conservation Hub’. A significant amount of open space is proposed to be retained and provided at the site, including many features recognisable at the site currently, as well as an enhanced children’s play areas and a re-modelled lake. A comprehensive landscape proposal has been provided, which respects the historic landscape, whilst integrating new development into the site. All listed and historically sensitive buildings are proposed to be retained and repurposed, whilst buildings and enclosures of less significance will be demolished to facilitate the development.

This proposal would facilitate the long-term management of the site, including the provision of free public access to the site for the first time in its history, permitted between 8am-7pm (June – September) and 8am-5pm for the remainder of the year. The proposed residential development is considered to be acceptable at the site, as it would essentially finance the long-term management of the site’s remaining landscape and significant buildings, whilst ensuring free access to members of the public. The development’s housing offer also attracts substantial positive weight given the Council currently cannot demonstrate a five year supply of deliverable housing sites.

The site is designated as Important Open Space in the development plan, where development other than for uses ancillary to the open space are resisted in principle. The proposal will however deliver high quality open spaces, sustained over the longer term, which will be publicly accessible at no charge to members of the public. On balance, the benefits associated with this provision are considered to outweigh the harm resulting from the application’s conflict with open space-related policies BCS9 and DM17. The proposal complies with the paragraph 99b of the NPPF. See Key Issue A ‘Principle of Development’.

The loss of the site as a community facility would be substantially offset by the proposal’s overall offer to the community, given the proposal would enable the site to continue to provide social, recreational and cultural facilities and services to the community. The proposal meets the expectations of policies BCS12 and DM5, and paragraph 93 of the NPPF. See Key Issue A ‘Principle of Development’.

The development poses a less than substantial level of harm to multiple heritage assets including: Grade II listed buildings, the Clifton and Hotwells Conservation Area, the Downs Conservation Area, and various locally listed/non-designated heritage assets. The harm to the designated heritage assets predominantly results from the following aspects of the proposal: the change of use resulting from the loss of the existing, albeit ceased, zoological use; and the quantity of residential development in

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

relation to both its location within the more central areas, and its scale and massing at the perimeter of the site. The Applicant has provided clear and convincing justification for this harm. In relation to the loss of the zoological use, the proposal ensures that the site will retain a communal value to Bristol, as whilst the meaning of the place to visitors will change, the site will continue to offer access to members of the public. Concerning the quantum of homes, the Applicant states the number of homes is necessary to enable sufficient recurring income to fund the management and maintenance of the publicly accessible gardens and spaces, and to sustain the heritage assets (including the historic gardens) in the long term. The public benefits that would flow from this development are considered to outweigh the great weight attributed to the less than substantial harm to the affected heritage assets, meaning heritage-related harm is not a reason to refuse this application. See Key Issue B 'Heritage Assessment'.

Whilst the development would provide a high quality, and on balance well-designed environment, the proposal's design is contrary to policies DM26 and DM27, as well as a small element of policy BCS21, due to its scale and massing failing to be appropriately informed by the local context. See Key Issue D 'Urban Design and Residential Amenity'.

The proposal will result in the removal of a significant number of trees but does retain those most significant and includes appropriate mitigation in the form of tree planting. Tree protection and method statements demonstrates the retained trees will be protected during construction, and whilst residential development is proposed close to trees, it will not unacceptably prejudice the trees' long-term viability. The landscape plans will provide a high-quality environment for future residents and members of the public visiting the site, and the proposed Management Plan provides a strong framework to fund the long-term management of the publicly accessible open spaces and gardens. See Key Issue C 'Green Infrastructure and Landscape Design'.

To achieve an optimal density whilst avoiding building on the most sensitive areas of the site, the proposal introduces built form at the edges of the site at a greater scale and mass to the existing situation, often with windows facing neighbouring properties. The absence of built form at the site's edges at a similar scale to that in the vicinity does heighten the impact of the proposal, as many neighbours currently have open vistas across the site. Some neighbours' amenity will be negatively impacted, but the impact is acceptable when considering all relevant considerations. See Key Issue E 'Impact on Neighbouring Properties'.

Concerns have been raised in relation to the proposal's highway safety impact, especially in relation to Clifton College's students. Transport Development Management raise no objection to development in this respect, the application accords with relevant transport and highway safety related planning policies and guidance. See Key Issue G 'Highway Safety and Transportation'.

The proposal will impact habitats, species, and features that contribute to nature conservation at the site, however suitable avoidance, mitigation and compensation measures have been proposed to ensure the conservation status of protected species are maintained. The submitted Shadow HRA provides sufficient evidence to rule out potential adverse effects from the development on the integrity of the habitats at the site. Finally, the submission indicates a net gain for biodiversity, which attracts positive weight in the planning balance. See Key Issue I 'Nature Conservation'.

The proposal and the supporting statements demonstrate compliance with policies BCS13, 14 and 15, and indeed in some cases that the expectations of these policies will be exceeded, such as the

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

reduction in CO2 emissions from residual energy use in the development. See Key Issue H 'Sustainability'.

Taking the policies of the development plan as a whole, overall it is concluded that the proposal is not in accordance with the development plan but that, on balance, there are sufficient material considerations to indicate that a decision otherwise than in accordance with the development plan would be warranted. It is concluded that the Council's statutory duties in relation to heritage, nature conservation, and equalities, can be satisfied.

The remaining report sets out that whilst there are adverse impacts associated with this proposal, on balance, they fail to significantly and demonstrably outweigh the proposal's benefits. The application is therefore recommended for approval subject to conditions and a section 106 Agreement, in accordance with Key Issue M.

**SITE DESCRIPTION**

The site has operated as a Zoological Garden since 1836. In addition to the Zoo Gardens use, ancillary uses at the site include a café/restaurant, event space, an education centre and a gift shop. The Zoo closed in 2022. The site is relatively flat and developed with a number of single and two storey buildings and significant landscaping. In addition, there are many animal enclosures and ancillary operational buildings of different sizes and forms, between which are garden areas, pedestrian walkways and a central lake. Elements of this layout remain from the early form of the site, including the Grand Terrace and the lake, although the form of the lake has evolved over the lifetime of the zoo. The site is enclosed by a perimeter wall and buildings that extends around most of the site. Paid public access is controlled through the ticket office at the north west corner of the site, with other points of access limited to servicing.

The site is bound by a car park and the A4176 (Clifton Down) to the north, beyond which is Clifton Down itself (both the car park to the north and the Downs beyond represent Common Land); Guthrie Road is to the south, beyond which is Clifton College; Northcote Road to the east, beyond which are Clifton College Preparatory School, boarding houses and residential dwellings; and College Road to the west, beyond which are residential properties and a former car park which has received planning permission for the erection of 62 dwellings (ref. 21/01999/F). The site is not within a designated town, district or local centre, but the site is accessible, with a well-serviced bus stop immediately to the north. Local services and facilities are found within 1km of the site at Alma Vale Road, Clifton Village and Whiteladies Road.

The Site is designated Important Open Space, but is not designated as 'Local Green Space' as defined by paragraph 101 of the National Planning Policy Framework (2021). In 2021 the site was designated as an Asset of Community Value, and some trees at the site are subject to Tree Preservation Order no. 1438. The Local Plan designated the site as Local Historic Parks and Gardens and the site is within the Clifton and Hotwells Conservation Area. There are six Grade II listed buildings within the site: Bristol Zoo Gardens entrance, Giraffe House, South entrance gates and flanking walls (Guthrie Road), Bear Pit, Monkey Temple, and Eagle Aviary. There are also locally listed buildings on the site, and the development would impact the setting of other non-designated heritage assets in the locality, as well as designated heritage assets, including Clifton College's collection of listed buildings to the south of Guthrie Road and the Downs Conservation Area to the north. The Council has also adopted an Article 4



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Direction for the area, removing the permitted development right to change from Use Class C3 to Use Class C4.

Clifton Down and Durdham Down is a designated as a Local Historic Park and Garden, a Site of Nature Conservation Interest (SNCI), and Important Open Space. To the west, separated from the site by roads, houses, and the Zoo's former car park is the Avon Gorge SNCI and Site of Special Scientific Interest, adjacent to which is the River Avon SNCI. On the western side of the Gorge is the Avon Gorge Woodlands SAC and the North Somerset and Mendip Bats SAC.

**APPLICATION**

Full planning permission is sought to redevelop the site to provide 196 residential dwellings (including 20% affordable) alongside approximately 500 sq. m Class E (commercial, business and service), F1 (learning and non-residential institutions) and F2 (local community uses) floorspace, a children's playground, provision of free public access, between 8am-7pm in the summer (June – September) and 8am-5pm for the remainder of the year, restoration of listed buildings, provision of new accesses (pedestrian, cycle and vehicular), associated parking, enhancement of lake, and biodiverse green roofs and photovoltaic solar panels incorporated throughout.

The development will be facilitated through the demolition of most of the non-listed buildings, animal enclosures on the site, the repurposing of some buildings (including all Listed buildings), and the construction of new buildings. Extensive landscaping is proposed.

The design rationale can be simplified to publicly accessible central gardens, with pavilion-like buildings, enclosed by perimeter apartment blocks. The perimeter apartment blocks are generally 4 – 5 storeys, with the exception being the Northern Block, which has a maximum height of 6 storeys. A single terrace of five houses is also proposed on College Rd. The new-build perimeter buildings are all set back from the historic boundary wall. The ground floors of the apartment buildings typically provides front doors to shared cores and other communal facilities, such as bin stores and cycle stores, and undercroft parking is also provided, with the intention of keeping cars out of the landscaped areas. A total of 22no. new-build houses are proposed within the inner gardens, these are referred to as Lakehouses. These houses are four storeys high, albeit two of the storeys are within the roofscape, the houses take design inspiration from general zoo architecture, including the Giraffe House. The former Museum (currently the Activity Centre), Great Aviary or Parrot House, Giraffe House, Clifton Pavilion, and Clock Tower will be converted into residential accommodation. Generally, these buildings will be sensitively restored and converted. The Entrance Lodge Buildings will be converted into a mixed use building (Classes E , F1, and F2), and is referred to as the 'Clifton Conservation Hub' within this report.

The key features of the planning application includes:

- 37no. Houses and 159no. flats, including: 60nos. 1-bedroom units, 71nos. 2-bedroom units, 34nos. 3-bedroom units, 27nos. 4-bedroom units, and 4nos. 5-bedroom units.
- 20% of the homes are proposed to be affordable homes.
- Free access to the public areas between 8am-7pm (June – September) and 8am-5pm for the remainder of the year.
- Retention of existing features, including the Grand Terrace, the Bear Pit, the East and West Lawn, the Theatre, the Monkey Temple, and the Bird Aviary. The provision of a large play area, new garden areas such as the Lakeside Garden, and the provision of a reshaped lake.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- All historically significant buildings will be converted to residential uses or repurposed as part of the public landscape.
- In total, 80 trees, 31 groups or part of, and 3 hedges are proposed for removal to facilitate the proposal, 470 new trees are proposed, far exceeding the required mitigation. Only a single TPO'd tree will be felled.
- 120 car parking spaces and 535 cycle parking spaces are proposed.
- Photovoltaic Panels are proposed on most roofs to provide electricity, with Air Source Heat Pumps and Ground Source Heat Pumps proposed to provide heat to the development.
- The proposal will achieve a net gain for biodiversity of 36% above the pre-development biodiversity value of the onsite habitat.

There is also an accompanying application for listed building consent for the works proposed that impacts the fabric of the listed buildings at the site, ref. 22/02889/LA.

**APPLICATION EVOLUTION**

As with most major planning applications, amendments have been made to the planning application since it was submitted, and in each case commensurate consultation has occurred.

In October 2022, major amendments were made to the proposal, which had the following affect. In short, the revisions to the proposal reduce the overall number of home proposed by five, included material design changes to the Clock Tower Building, Building S1, Buildings E1 and E2, and North Buildings. Further, the mix of affordable homes were amended to include a greater proportion of 3-bedroom homes, and changes were made to some of the pedestrian accesses to the site. Further, supporting documents were revised or addendums issued to address the revised plans, as well as concerns. 21 days consultation followed.

In January 2023, further supporting information was also provided, including detailed justification for some of the proposal's impacts. Further, revised plans were submitted, most notably to address residential amenity concerns on Northcote Road. 14 days consultation followed.

**RELEVANT PLANNING HISTORY**

Most of the planning history for the site relates to various zoo-related developments and works to trees. Planning permission was also recently granted for a residential development on the Zoo's former car park on College Road (the West Car Park).

An Environmental Impact Assessment screening request (ref: 21/06402/SCR) was submitted to the Council in November 2021 because the proposed development falls within Schedule 2 of the EIA Regulations 2017 (i.e. it comprises an urban development project including more than 150 dwellings). The Council confirmed in a letter dated 06.01.22 that, taking into account the characteristics of the development, its location and nature of the impacts, an Environmental Impact Assessment is not required for the proposed development. The Screening Opinion is still considered sound in light of the knowledge gained as a result of this planning application.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

## **COMMUNITY INVOLVEMENT**

The Applicant has submitted a statement of community involvement, which details the community engagement programme and summarises feedback from the community. Whilst it is evident that some aspects of the development have responded to community-held concerns, there are many concerns that have not been addressed through changes to the proposal.

## **RESPONSE TO PUBLICITY – MEMBERS OF THE PUBLIC**

The application was advertised by site and press notice, and neighbours were notified of the application by letter. In response to the submission of amended plans and further information, additional notification occurred in November 2022 for 21 days. A further period of notification commenced in January 2023 for 14 days in response to the submission of further details, including amended plans. The application was also advertised in February 2023, in accordance with Article 15, Part 3 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 given the granting of planning permission would represent a departure from the provisions of the development plan.

In total, 475 objections and 59 support comments have been received (as of 17.04.2023). These comments are summarised below, comments made by key local stakeholders such as interest groups or residents' associations are summarised under their respective group names.

For information, Appendix 1 and 2 to this report includes a record of the representations received in respect of this planning application. Due to the limits of the Council's IT System and the number of representations received, the record of consultation responses included in the appendices is not exhaustive. However, officers have reviewed all the representations and are satisfied that all material matters raised have been adequately summarised in the report itself.

### **Objection Comments**

i. Principle

- The Society has not established the case for a change of use, including that the Zoo cannot continue to operate the site as a Zoo, or that another visitor attractions would not be viable from the site. Comments have argued that the Zoo could still provide suitable facilities for keeping animals, and that any reported decline in visitor numbers to the Zoo have been misreported. Many comments have questioned the business case for the Zoo's closure. Further, some comments questioned the Applicant's decision-making in relation to closing the Zoo, suggesting that other options to closure should have been taken. Further criticism of the Applicant's choice to close the Zoo, suggesting that the Applicant's own reports did not suggest significant financial issues, and the main influence of reductions to visitor numbers is a result of the growth of visitor numbers at the Wild Place.
- Some comments also suggested that alternative custodians for the site could take it forward, such as English Heritage, Landmark Trust or National Trust. Some comments acknowledged the Applicant's provided reasoning, including that the existing site could struggle to meet current animal welfare standards.
- The proposal does not justify the loss of the community facility in relation to policies DM5 and BCS12. Unjustified harm to the community through the loss of communal value and space. The Zoo is of national significance, the community/Bristol should be afforded time to determine its future in the public interest.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- The proposal fails policies, including those that safeguard important open space and community uses. The development will mean the loss of valuable communal and green space, as well as a place of education.
  - The Wild Place is not a suitable alternative due to accessibility issues, including that it is difficult to access by public transport.
  - The site should be listed, protected and preserved as a public space, where the focus is on wildlife and conservation.
  - Many comments highlighted the Zoo's meaning, relating to its communal value to Bristol.
  - The loss of the Zoo will harm Bristol's economy.
  - The number of dwellings is excessive.
  - The removal of the Zoo from the area will reduce the diversity of Clifton's offer to Bristol.
  - Development should be prioritise brownfield sites.
- ii. Publicly Accessible Open Space
- Public access to the open spaces will not be retained in future.
  - The public benefit associated with free access is undermined due to nearby access to the Downs.
  - A sum of money should be put in trust by the developers for the grounds maintenance from the outset.
  - Many comments highlighted that the current site provides a safe open space for children to use, and have suggested the development will not.
  - Criticism of the introduction of traffic within the site.
  - The proposal results in a loss of green space to visitors.
  - Alternative models to fund the management of the public gardens should be reviewed.
  - Greater details of the management board are needed.
- iii. Heritage and Urban Design
- The proposal will harm the setting of the Conservation Area, listed buildings and the character of the area:
    - The buildings are unsympathetic to, and out of scale and proportion with surrounding buildings. Buildings in the vicinity are largely 4 storeys, rather than 6 storeys.
    - The closure of the Zoo will result in heritage harm, and is not justified.
    - The plans are unclear regarding the demolition of buildings.
    - Numerous trees will be removed and the resultant public green space will be much smaller, which is harmful to the Zoo's listing as a local Historic Park & Garden and an Important Open Space.
    - The design should be modified so that it remains in keeping with Clifton, and its Georgian and Victorian architecture.
    - The design is not sympathetic to the Conservation Area.
    - The development fails paragraph 189 of the NPPF.
    - The proposal's lack architectural merit.
    - Loss of historic boundary features.
    - The harm is substantial in nature.
  - The application fails policy DM31i as insufficient information has been provided to demonstrate that 'all reasonable efforts' have been made to sustain the existing use. The gardens will not be of the same public interest when compared to the existing site.
  - The proposal will result in the loss of light to roads and pavements

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- The proposal represents the overdevelopment of the site.
  - The proposal will overwhelm the streetscape
  - Computer generated images produced by the Applicant are misleading
  - Many comments highlighted the site's the cultural, historical, architectural and communal significance.
  - The development will deliver a gated community.
  - A car-free development would have a less-harmful impact on the development.
  - The proposal would harm views from the Downs.
  - The plans provided fail to given an accurate representation of the development.
  - The proposal refers to the major demolition of buildings.
- iv. Landscape and Trees
- The loss of trees is excessive and not adequately justified by mitigation/replacement planting.
  - Concerns that the spaces within the site proposed for public access will not be retained for perpetuity
  - Underground services would result in the removal of more existing trees than is suggested in the submission
  - Concerns that the public areas will not be managed or monitored.
  - Translocated trees rarely survive.
  - Trees of national importance will be put at risk.
  - The gardens warrant botanical special interest.
- v. Transport and Highway Safety
- The number of homes will impact local highway safety due to increased traffic
  - The amount of development will overwhelm local infrastructure.
  - The amount of car parking proposed is too high. Whereas some comments suggest insufficient car parking has been provided. Other have expressed concerns regarding the loss of on-street parking resulting from the proposed accesses.
  - There are pre-existing highway issues due to Clifton College's drop-off and pick-ups, the proposals would make this situation worse.
  - The First Bus route may reroute in future.
  - The construction phase will result in highway safety issues.
  - The Transport Assessments should not rely on the existing use of the site a baseline.
- vi. Nature Conservation
- The development would lead to a loss in biodiversity.
  - The proposal will remove mature trees and adversely affect local wildlife.
  - The site should be retained for people and nature.
- vii. Sustainability / Climate Change
- Very detailed comments questioned the figures provided within the submitted Sustainability and Energy Statements, suggesting they were incorrect. Including that the outdated carbon factors have been utilised within the Applicant's Energy Statement.
  - Criticisms of the proposal in relation to embodied carbon, largely that the proposal includes the demolition too many buildings. Suggestion that the proposal fails the National Model Design Code, the NPPF and policies BCS13, BCS14, and BCS15. The development is inconsistent with the Net Zero Strategy.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- The proposal will not mitigate or adapt to climate change, many comments suggested the loss of trees at the site represents evidence of this.
- The demolition of the recently built Education Centre is a waste of resources.

## viii. Impact on Neighbours

- The proposal will harm neighbours amenity through negatively their impacting: privacy, light, and outlook. The proposal's daylight and sunlight impact fails BRE guidelines.
- The proposal will have an overbearing impact on neighbours.
- The proposal will result in increased noise, harmful to neighbours' amenity.
- The proposal will overlook the College, resulting in safeguarding issues.
- The construction-phase will be very disruptive to the whole area.

## ix. Housing Offer

- Suggestion that the homes will be luxury housing and unaffordable.
- 20% affordable homes is insufficient, a minimum 40% in accordance with Policy BCS17 should be utilised, rather than applying the Affordable Housing Practice Note.
- The affordable homes proposes are not integrated into the development, rather they are concentrated in Block S1, with first homes within Blocks E2 and 3.
- There is a sufficient number of flats in Clifton.
- The Council's lack of a five year housing land supply should not be used as justification to allow the development. The shortfall may well be met elsewhere through other development, and the growth in construction activity is limited by a shortage in labour, which may hamper delivery.
- There are many vacant homes in Bristol, their re-use should be prioritised over new housing development.

## x. Other Matters

- The development would give rise to air pollution
- A suggestion that it would be corrupt to allow the development.
- The development would allow the site to be given over to private investment, rather than remaining a public resource.
- There is insufficient infrastructure in Clifton to provide for development.
- The development is not in the best interests of the animals kept at the Zoo. Not all animals have been moved to the Wild Place.
- Criticisms of a perceived lack of meaningful community engagement.
- Suggestion that the Society is prioritising financial gain over public good.
- The applications for this site and the West Car Park should be considered as one application.
- The economic benefits of the proposal are misreported within the 'Economic Benefits Assessment' and should not be relied upon.
- The proposal will not generate employment, it will a deliver a net loss compared to the existing use.
- The evidence available does not support the argument that conservation and high quality environmental management at a local and national level will be enhanced, and there is little guarantee that there will be wildlife benefits.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA****Support Comments**

## i. Principle

- Provide much needed housing, including affordable housing.
- The flats would provide for residents of Clifton to downsize.
- Acknowledgement of Bristol's growth and the need to provide housing to continue to facilitate the growth.
- The plans provide free public access to the gardens, representing continued access to the site for the community.
- Suggestion that the Wild Place could "help fill the void left" by the Zoo's closure.
- Retaining such an important site to the people of Bristol and Clifton is of huge importance.

## ii. Heritage and Urban Design

- The development is attractive and allows the central historic gardens to be open to the public for free.
- The development is an opportunity to provide exciting modern and sustainable housing
- Support for retention and conversion of heritage assets.

## iii. Sustainability / Climate Change

- Building at higher densities allows for sustainable modes of transport.
- Support for modern housing designed with the environment in mind.

## iv. Other Matters

- The Zoo's works will continue at the Wild Place.
- Acknowledgement that it is no longer appropriate to keep animals at the Zoo.

**Clifton and Hotwells Improvement Society – Object**Final Comments:

The minor modifications recently made to this Application entirely fail to address the concerns of CHIS who consider it to be clearly contrary to BCS 22. It represents an over-intense and overbearing development which would, without reasonable justification, adversely affect the character of this part of the Clifton Conservation Area and the setting of its listed buildings.

Our views are entirely in line with those of Bristol City Council's Conservation Advisory Panel of which CHIS is a member and whose letter of 20 November 2022 sets out in some detail the architectural poverty of the scheme and its detrimental impact on heritage assets

Second Comments:

CHIS strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable. The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape, and skyscape of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique. Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

ignored. The following points summarise some of the most blatantly pernicious aspects of the proposals :

1. 196 dwellings represents a massively over-dense development of the site.
2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest.
3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the block on the northern boundary,
4. The proposed terracing is not appropriate in this area.
5. The loss of trees will be compounded by the inevitable damage to the root systems of many other trees by infrastructure work.

Initial comments: largely the same as those above so not repeated.

**SAVE Bristol Zoo Gardens Campaign – Object**

Overall Comment: The Campaign to Save Bristol Zoo Gardens (SBZG) started with an investigation into how the Zoological Society had made its decision to close the Clifton site and into the business reasons provided. The Campaign found that these reasons which would support their claim that the Zoo was no longer viable on the Clifton site were unfounded. The following points below specify how the application is in breach of planning law and policy.

Change of Use not justified: The Campaign has enlisted the support of accountants and a former Zoo Director who have confirmed that there is no reason the 186 year old site should not continue in business as a successful visitor attraction. Income, profitability and visitor numbers had all been positive in the decade preceding 2020 and all showed sign of recovery to their pre-Covid levels prior to the Zoo's closure. The picture of the Clifton site as an inevitable failure is false and the decision to sell all their property in Clifton was taken to provide capital funds for their Wild Place Project in Gloucestershire. Both Local Plan policy DM5 and Core Strategy Policy BCS12 make direct reference to the fact that the loss of Community Facilities will not be permitted unless it can be clearly demonstrated that there is no longer a demand for the facility or that the building/s are no longer suitable to accommodate the use and the building cannot be retained or adapted to another community use. Furthermore Policy DM5 goes on to state that the loss of a community facility will only be acceptable if a replacement facility can be provided in 'a suitable alternative location'. The Zoo's own figures indicate that there is still a continuing demand and zoo keepers and zoologists confirm that the site is suitable for certain species of animal. Many alternative community uses have been proposed, ranging from a city farm to an Eden Project style gardens. Sufficient time has not been given to explore these possibilities or their funding. The Wild Place is not a suitable alternative location, requiring car transport, whereas a city zoo is easily accessed by public transport, bicycle or on foot.

Ecology and Sustainability: The Bristol Tree Forum has already challenged the Zoo's claim of a 38% increase in biodiversity as it is based on outdated methodology. They estimate the outcome to be a 22% net loss. The loss of trees is excessive and experts fear for the remainder when surrounded by building works and then by tall buildings. The proposal to plant '2 for 1' is less than the Council's Tree Replacement Standard. Demolition and rebuilding is not the preferred approach by RIBA due to the loss of embodied energy in demolition and the carbon cost on construction materials. A Bristol environment expert supporting the Campaign estimates the carbon cost of the construction proposed



**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

on the site would be equivalent to running the existing buildings for 2500 years. Adaptation or reuse is to be preferred.

**Public amenity:** The proposed public access and maintenance of the gardens is to be funded by a levy on the residents. But there is insufficient evidence that this right will be granted in perpetuity as this access is permissive and could be modified or withdrawn. It is the prediction of many objectors to his scheme that the residents will object to funding a public amenity and in time it will become a private space. The scheme provides no long term protection of public access. This could be provided by the dedication of the site for public access in perpetuity under section 16 of the Countryside and Rights of Way Act 2000, which would be binding on subsequent owners. Alternatively, designation as a town or village green. The Zoo could apply for voluntary registration under the Commons Act 2006

**Harm to overall historic interest and significance of site:** The May 2022 Heritage Statement acknowledged the harm that is caused to the site and Conservation Area through the departure of the Zoo from its historic home, a point echoed by Historic England. The SBZG disagrees that this harm is justified by the current proposal. The significance and irreplaceability of the site as a whole is fundamental to this application. Bristol Zoo Gardens is the oldest one in the UK and the fifth oldest in the world. It has been open for 186 years. NPPF 189 states: 'These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'.

**Loss of Communal Value:** Defined as 'Value deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.' in English Heritage, Conservation Principles, 2008. At the public level, hundreds of thousands of people have visited the Zoo as children, as adults and with their own children for more than 150 years and the loss of this experience is not to be taken lightly. Additionally, the ashes of many people have been scattered within the herbaceous borders - to be lost under a roadway - while others have held weddings and celebrations in the Pavilion, which will be lost to flats.

**Harm to listed buildings:** The original and particular use of many of the buildings is integral to their historic significance and is cited as a key reason in the listing designations of the four animal houses on the site, justifying their listing at Grade II and their national importance. Harm to an asset of this significance should clearly be only as a last resort. The D&A statement refers to 'Historically significant buildings retained and sensitively converted to unique, environmentally sustainable homes'. But the SBZG finds that such conversion would completely change the presentation and significance of these buildings, meaning the loss of: the Clifton Pavilion, Great Aviary/Parrot House, Giraffe House and the Museum/Activity Centre, all to apartments. It is not considered that the applicant has made the case for the level of harm proposed to the listed buildings within the site.

**Justification of harm:** It is recognised by the NPPF that new uses are sometimes needed for heritage assets to generate income for their long-term future. In order to do this, it may be necessary to cause some harm, but it is clear that in identifying the 'optimum viable use' for a heritage asset, the optimum viable use is one that causes the least harm to significance. The SBZG argues that the proposed scheme would cause significant and irreversible harm and is not justified.

**Alternatives:** Other proposals for the site have been put forward either in broad outline or in detail and this suggests that other schemes are possible. Covid has provided a distraction so that disposal of the site is presented as a finished decision. But this is a nationally important site and time could usefully be taken to allow further time for ideas or to run a competition to determine its future. The Campaign's

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

preference is that it reopens as 'a Zoo fit for the 21st century' which was the Zoo's strategy up to 2020.

**Design:** Even if there were no alternative to building densely on the site, the proposal is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over-intensive with a consequential poor relationship with the adjacent school and its listed buildings. The north building at six storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular the Bear Pit would be overly dominated by new development.

**Landscape:** Bristol Zoo Gardens are a locally listed heritage asset designated as a Local Historic Park/Garden and an Important Open Space. The Avon Gardens Trust has voiced concerns around the loss of trees, the viability of translocating other trees and hedges and the general impact on green infrastructure from ground and environmental disturbance during the long phases of works and the eventual overshadowing from tall buildings.

**Cars and Parking:** The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought not least as it creates another visual and psychological barrier for free pedestrian access to the green spaces within the site. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site.

**Clifton College – Object**

Clifton College has responded to each round of consultation in response to this planning application, a record of their reported engagement with the Applicant is included below. This represents a summary of Clifton college's final comments, all of their comments can be reviewed in full in Appendix [enter] (on the website). Their comments have also been supported by Highway Technical Note, authored by Highgate Transportation.

As long-standing members and neighbours of BZS, Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however, as an operational school with overall responsibility for the safeguarding of its pupils, the revised proposals continue to raise a number of significant concerns for Clifton College, which this letter addresses. Clifton College has engaged with BZS Team to discuss unresolved concerns, including safeguarding and overlooking into sensitive school buildings and grounds, highway safety, daylight/sunlight and heritage impacts.

With regard to safeguarding and overlooking, Clifton College acknowledges the changes and further information provided by the Applicant to address overlooking, but finds that the changes do not go far enough to reduce the risk of overlooking. Their concerns are summarised below:

- Clifton College advises that to wholly alleviate its safeguarding concerns around overlooking, angled bay window alterations (as made to Block E1) should be made to all windows in Block E1 facing the College's Preparatory School Main Building (Building 4)<sup>1</sup> and Mansfield's House (Building 3), particularly those which face into/out of a bedroom.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- Block E2 is proposed opposite 7- 8 Northcote Road (Building 7) which includes the Director of Safeguarding's office, Prep School Counsellor, Chaplaincy and multi faith room, Prep EAL and learning support department, the Hornby Arts Centre (Building 9) and Bretten Memorial Hall (Building 8). The amendments made are considered to be marginal, and the College still holds concerns around safeguarding and overlooking.
- The proposal introduces new access to the site, including adjacent to the Joseph Cooper Music School. This new pedestrian route would bring pedestrians along a narrow path which has windows immediately onto the path within both the Joseph Cooper Music School and the new Building S1. There is also an overlooking concern with the windows at the eastern end of the Joseph Cooper Music School and the windows at the western end of the new Building S1 looking directly onto each other in addition the overlooking potential and privacy issues arising from the new pedestrian route.

In relation to highway safety and the Clifton College, particularly its students, the College holds concerns around increased vehicle movements and potential risk to the College's pupils, which they suggest the application submission does not address. Specific concerns:

- Traffic generation: Clifton College considers that concerns around increased vehicle movements and potential risk to the College's pupils have not been addressed. Further information is required to: evidence the transport movements into and out of the site, the volume of movement into and out of the site.
- Guthrie Road access: The Highway Technical Note provided by Highgate Transportation raised concerns that this is currently a gated access and is narrow and not wide enough for vehicles, pedestrians and cycles to access and use alongside each other. As has been set out, this could cause a highway safety issue for pedestrians, including school children as a car would have to wait over the footway if a cycle was exiting the site.
- Northcote Road access: There are concerns around conflicts at drop off and pick up times which will be more noticeable if the gates are allowed to open at 8am as is proposed. The potential conflicts with the new access points are a significant safety concern particularly for some of the school's youngest pupils who are currently dropped off along Northcote Road. The concerns expressed previously have not been overcome and furthermore a Road Safety Audit has not been undertaken of the proposed access.
- College Road Access: The Highway Technical Note previously identified the need for a road safety audit to be undertaken of the proposed access to establish that appropriate visibility splays can be provided. This work is still outstanding accordingly there is no technical evidence that the proposed access will be acceptable from a highway safety perspective when taking into account the various road users and in particular the more vulnerable users, namely pedestrian / school children.
- The Highway Technical Note also raises concerns relating to the proposed parking surveys that have been undertaken as well as concerns which persist about the impact on the existing coach parking and schools drop off and pick up points.

With regard to the proposal's daylight and sunlight impact on Clifton College's buildings, the College advises that their concerns around material impacts on boarding houses and daylight/sunlight have not been addressed and the College request these outstanding queries be addressed ahead of a decision being made on the application.

- No justification as to why the impact on Pooles House and South Town is judged to be acceptable.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- In relation to Poole's House on Northcote Road, the Daylight and Sunlight Report (April 2022) states that 4 rooms located at lower ground level have the potential to receive a medium to high reduction in daylight levels (under the NSI measurement). These are used throughout the day and evening and therefore impacts on their daylight/sunlight is a material consideration which needs to be addressed.
- In relation to Watson's House it is not clear if further information has been provided to the Council, but to confirm this is boarding accommodation and it is felt will be detrimentally affected by the proposal
- It is also notable that for the South Town building (a house on Guthrie Road) is a pastoral day house and therefore it is sensitive to the loss of light. No evidence has been provided to demonstrate that the building will retain acceptable levels of daylight.
- The Daylight and Sunlight Report does not assess the impact of the proposals on the existing play areas and amenity spaces that surround the site. The impact on these should also be assessed.

## Heritage and Design Concerns:

- The scheme will have a significant impact on the setting of Heritage Assets. The proposed five storey, flat roofed, perimeter blocks would be a stark juxtaposition against the variety of Clifton College buildings and residential buildings that surround the site. The predominance of 'bold architecture' that does not respond to the context cannot be considered neutral.
- The proposed perimeter buildings fail to conform to Policy DM26: Local Character and Distinctiveness, of the adopted Site Allocations and Development Management Policies Local Plan (2014). In addition the residential elements of the scheme do not align with the principles contained within the Council's adopted Urban Living SPD (November 2018) in particular relating to responding positively to the context. It is considered that the proposals do not respond appropriately to the height, scale, massing, shape, form and proportion of existing buildings, skylines and roofscapes. It is also considered that the proposals fail to reflect locally characteristic architectural styles, rhythms, patterns, features and themes taking account of their scale and proportions.
- A Visually Verified Montage (VVM) was provided from across the College playing fields, by this does not take into account the taller blocks proposed on the northern or eastern side of the site. Verified Views have also not been taken for other key views within the Conservation Area, including LC24 and L25 from the Conservation Area Appraisal. It is noted that CGI views have been submitted, these are not 'settles CGIs' and cannot be considered as part of the overall determination, the College requests that these additional CGIs are updated and formally submitted for consideration.
- 2D comparisons have been submitted, these do not convey heights, daylight/sunlight, and the orientation and layout of the development.
- The Conservation Education Centre was only recently built, the College questions the sustainability of demolishing a recently developed building and whether it would be more appropriate to retain this in education use which would require minimal works given the existing use of the building.

## Construction Impact and Conditions:

- Noise and traffic generated by construction operations is a concern. Clifton College requests that it is consulted on any future Construction Management Plans or Method Statements before approval by the Council.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- The College wishes to see the Applicant involved in the future management of the site for the long term to ensure that the interests of itself and the wider community continue to be considered.

As discussed above, the College instructed Highgate Transportation to review the proposal and provide comments. Their comments are summarised below:

The site is surrounded on at least two sides by Clifton College and the route for new residents and Clifton Village (for example) will increase vehicular movements on College Road and Guthrie Road. Furthermore, the proposed two-way vehicular access at the northern end of Northcote Road funnel new vehicular movements through a busy entrance/exit for around 200 Prep pupils (7-13 year olds); with the residential peak hours coinciding with school drop off in the morning and pick up late afternoon. Further to generally educational uses, the note sets out that College also hosts many events, meaning it operates 52 weeks of the year, with thousands of pedestrian movements daily concentrated in and between Guthrie Road, College Road and Northcote Road in particular.

The transport work has failed to consider the impact of the vehicular trips generated by the redevelopment, with its new access points, on the pupils of Clifton College. Not only were the majority of vehicle movements associated with the BZG confined to the northern side of the site (the A4176) i.e. away from Clifton College pedestrian movements, but the peak hours and peak season i.e. the busiest times for BZG trip attraction (as used for the baseline assessment in the transport work) do not coincide with the daily movement of pupils as would the proposed residential scheme. Given this, the net traffic impact benefit cited in the application is of no significance when considering the increase in vehicular traffic forecast on Northcote Road, Guthrie Road and College Road as a direct result of the redevelopment. This is to the detriment of highway safety of vulnerable road users.

Northcote Rd: In summary, there are a minimum of around 100 pupil movements along Northcote Road hourly, rising to around 200 during the lunchtime period, up to around 400 pupil movements on Wednesday afternoons, and as many as 500 movements between 0745 and 0815 and also between 1600 and 1800 hours i.e. thousands of vulnerable road user movements per day. Given this level of footfall, it is clear that further pedestrian movements on this single footway will result in either adults or children walking in the carriageway, significantly increasing the risk of a serious or even fatal pedestrian/vehicle collision occurring. The proposed pedestrian crossing build-out from the BZG site centrally on Northcote Road is clearly of no benefit to Clifton College pupils given there is to be no footway on the western side to cross to i.e. this is only a link to the site. It should be noted here that the transport assessment work failed to acknowledge the vulnerable road user personal injury accidents recorded.

Guthrie Rd: In summary, there are a minimum of around 100 pupil movements crossing the carriageway at the junction of Northcote Road and Guthrie Road hourly, the majority of which are unaccompanied (aged 11-13) and accompanied (aged 4-11) pupils travelling between Northcote Road and Guthrie Road (west). This rises to at least 300 pupil movements crossing the carriageway at the junction during the morning and evening peaks. There are further east-west movements of around 100 Upper School pupils at the junction each hour. It is clear that an increase in pedestrian and vehicle traffic across this junction will result in a corresponding increase to risk, particularly to the vulnerable road users - who are the main users of the junction. No improvements to the crossing facilities at this junction are proposed as part of the BZG development.

College Rd: Guthrie Road forms a simple priority junction at its western end with College Road. A raised table covers the area of the junction, which forms an informal shared space between

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

pedestrians and vehicular traffic and provides a calming effect to vehicles traversing the junction. Uncontrolled crossings are also provided on each arm, marked by tactile paving. This junction facilitates a high number of pedestrian movements across it – at least 300 hourly throughout the day, with significantly more during the peaks, due in part to the College facilities on both sides of the roads and coach pick-up/drop-off point situated adjacent to the junction. These movements are made over all arms of the junction, and also diagonally across the carriageway. It is understood that this arrangement operates satisfactorily with current levels of traffic. However, an increase in traffic during the peak hours and throughout the day (arising from the new access locations around the BZG site on key roads) is likely to result in serious additional risk to the vulnerable road users crossing at this junction. College Road is a single carriageway road, with footways around 1.9 metres wide on both sides of the carriageway. On-street parking, marked with dashed white lines, is present along much of the length of the road on both sides. College Road, at and south of Guthrie Road is an important thoroughfare for pupil movements to, from and around Clifton College, as college facilities and pupil accommodation buildings are located on this road. Pupils accessing the College from accommodation on the western side of College Road cross the carriageway, and vice-versa. A zebra crossing facilitates some of these movements, however, it is located off the main desire lines. Informal crossing movements are common throughout the day, at around 200 pupil movements per hour.

Access to New Field: pedestrian movements are made via Percival Road or Cecil Road, with up to around 150 pupil movements in an hour cross this junction during the day when accessing New Field, with significant increases on event days, which may see many hundreds of pedestrian movements in a short space of time.

Other vehicles movements, deliveries, coach and mini-bus travel: Porter's Lodge on Guthrie Rd received deliveries to the College on Guthrie Rd opposite the junction with Northcote Rd. Catering deliveries are made on the south side of Guthrie Rd, often the LGVs and HGVs overhang the footway. Coaches and minibuses are regularly used to transport pupils attending Clifton College to the Sports Ground in Leigh Woods or to other schools for fixtures. There is a coach pick up/drop-off point on the north side of Guthrie Road, close to the junction with College Road. Coaches pick up and drop off pupils here multiple times Monday to Saturday to transfer pupils between sites.

Traffic Generation: Clifton College is not in agreement with the trip rates and distribution from the submitted transport assessment work. The work does also not take Saturdays into account, where high volumes of development trips to/from Clifton Village will use these three important road links, in direct conflict with vulnerable road users.

**Northcote Road Residents' Association – Object**

Various comments have been received from local residents, including from Humphreys and Co Solicitors and Anstey Horne (Daylight/Sunlight) on behalf of the Association. These comments are summarised below and are available in full within Appendix/Supporting Documents to this report.

Unnecessary and Insufficient Mitigated Harm to Heritage Assets:

- Harm associated with the loss of a nationally recognised zoological facility and its gardens, reiterating the Conservation Advisory Panel's concerns, especially with regard to the suggested lack of evidence to indicate that the closure and change of use, is economically necessary, or that alternative less harmful uses have been considered. Insufficient evidence to demonstrate that the need for such facilities could not be met in other ways, either in a more appropriate scale, form and design, or on other sites. No evidence to suggest the extra

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

housing is necessary nor significant compared with the demands of the Core Strategy. As such, the tests in the NPPF are not met as the loss of the heritage asset is not necessary to achieve those public benefits. The harm to caused is substantial.

- The listed buildings at the site would be lost to residential use, erasing all connection with the history of the site and its former use, as would the loss of the herbaceous border where many people's ashes were spread. Loss of these buildings do not meet the NPPF's tests.
- The public benefits of the proposal's have been overstated, including public access. The public appeal of the Zoo will be reduced, harming the site's value as a historic and community asset. The harm posed by the development to the gardens, the Conservation Area, and the neighbourhood are considered to be far greater than the new benefits. Further, the benefit associated with new housing and community facilities is severely compromised by a design and layout that would grossly overdevelop the site, to the detriment to the character, appearance, significance and setting of the Conservation Area, the zoological facility, its gardens and the listed buildings.
- The size, scale, height, repetitive form, design and massing of the development fails to respond to the character of the area and would dominate the immediate townscape, as well as the gardens. The proposal's mass and design is contrary to the NPPF's expectations for developments to be sympathetic to local character and history, as well as the November 22 Local Plan Review. The submitted CGIs are selective and do not show the full size, scale, height, bulk and massing of the buildings, and nor do they accurately depict trees.
- Inadequate justification for the proposal's harm is provided. The proposal's design and impact on the Conservation Area fails policies BCS20, 21 and 22, and DM26, 27, 28, 29 and 31.

#### Unnecessary and Insufficiently Mitigated Harms to Residential Amenities:

- The proposal will overpower, overbear, and overshadow residents, as well overlook them.
- The development would lead to a significant material loss of light to important habitable room windows in existing neighbouring residential properties. The members of the association are still awaiting additional information from the Zoo's light consultants (Officer note: this was provided to Humphreys and Co on 06.02.2023). The Residents' commissioned Daylight and Sunlight assessment (Anstey Horne) included critical differences to the submitted Daylight and Sunlight assessments, and as such is not considered to be accurate or acceptable.
- The development would harm outlook due to the development's position, scale, height and mass.
- The impact on residents light and outlook would be out-of-character with well-established characteristics in the locality.
- The proposal would fail to safeguard the amenity and ensure appropriate levels of privacy, outlook and daylight for existing development, contrary to policies BCS21 and DM27, and the NPPF.

#### Committee:

- Members are requested to visit the site and surrounding area. The resident would also welcome visitation to some neighbouring properties.

On behalf of the Residents' Association, Anstey Horne submitted a letter objecting to the proposal's daylight and sunlight impact (19.12.22). Principally, the comments advise that the information provided by the Applicant is not complete at this stage and the Council should request the additional information summarised below to be provided to have the full picture of the actual impact on the

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

neighbouring properties before determining the application. Upon submission of the additional elements, we would welcome a period of consultation which would allow us to comment on the amended report if needed. These are summarised below:

- General criticism of the Applicant's Daylight and Sunlight Assessment submissions, including suggestions that BRE guidance has not been correctly followed, environmental impact assessment criteria had been relied on, and appeal decisions of representative proposals were referenced.
- Suggestions that the Applicant's submissions incorrectly considers the nos. 1 – 6 Northcote Road to have room depths of 4 metres, when in reality numerous rooms in the most crucial areas on the lower ground and ground floors are around 5.2m deep. The comments suggest that the room depth is crucial to understand the impact on the sky visibility. Daylight distribution contour drawings should be submitted.
- Agreement with the Applicant's use of the following daylight / sunlight tests: Vertical Sky Component (VSC), Daylight Distribution (DD/NSL) and Annual Probable Sunlight Hours (APSH).
- If room depths were accurate, some room would fail the NSL assessments. Daylight distribution drawings were not included in the Applicant's submission.
- Further APSH tests were also requested with regard to the main window in no. 5 (room W1).
- An overshadowing assessment is requested for the front gardens of nos. 1 and 2.

Anstey Horne submitted a further letter (02.03.23) advising that the Applicant's Daylight and Sunlight Assessor's (Delva Patman Redler) response to Anstey Horne's concerns was insufficient, as it failed to report figures regarding the VSC accurately, and thereby skewed the conclusions. Similarly, they suggested that the Applicant incorrectly reported overall impacts on nos, 1 – 6 Northcote Rd, by suggesting improvements to performance, whereas in reality, these improvements were due to discounting non-habitable rooms from the assessment. Finally, the letter advised that the Applicant's assessment should take into account a large existing tree that is within the gap between Blocks E2 and E3, as the tree reduces the amount of light experienced by nos. 1-6 Northcote Rd.

**Bristol Tree Forum – objects**

The Bristol Tree Forum's comments can be reviewed in full within the Appendix/Supporting Documents to this report, this represents summarised comments. This summary largely reflect the initial comments which set out in great detail the Bristol Tree Forum's concerns. The Bristol Tree Forum also submitted meeting minutes and email records from discussions with the Applicant, largely regarding biodiversity and trees. The comments set out the policy and guidance surrounding issues including heritage, green infrastructure, and ecology and biodiversity.

The Site: the Zoo has an international reputation, not only as a Zoo, but for its collection of trees and plants. The collection includes nationally recognised plants, including Champion Trees recorded on the National Tree register, National Conservation Collection of Plants and Gardens/Royal Horticultural Society plant collections e.g., *Caryopteris* and *Hedychiu*. Further, the Zoo has reported that their plant collections are used to help realise appropriate national initiatives such as the UK Plant Diversity Challenge and ISO14001 environmental standard, and they contribute to the work of the UK Plant Network and the Plant Working Group of the British and Irish Association of Zoos and Aquariums. the site is also subject to a tree preservation order. The Zoo Gardens are within the Clifton Conservation Area and immediately adjacent to the Clifton and Durdham Down SNCI (a Site of Nature Conservation Interest), which is also an Important Open Space (DM17), a Town and Village



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Green (TVG) and a Valuable Urban Landscape (DM17). At its nearest point, the Zoo Gardens are within 200 metres the Avon Gorge Special Site of Scientific Interest (SSSI) and the Avon Gorge Woodlands Special Area of Conservation (SAC), and so well within their Impact Risk Zones (IRZ).

Conclusions, the applicant has failed to comply with the minimum requirements of the planning authority:

- The proposals will result in harm and the loss of the significance of this historic garden asset. The loss of the historic garden asset will result in harm to, or loss of, significance to a designated heritage asset. The reduction of the accessibility to the gardens and introduction of cares will destroy the current amenity of the site, and introduce pollution into the gardens and will damage the unique habitat and ecology of the site.
- The BZG is within the impact risk zone of the adjacent SSSI and SAC and the Avon Gorge Ancient Woodlands. It is also immediately adjacent to the Durdham and Clifton Downs SNCI. This has not been addressed even though.
- Of the 381 on-site trees, 162 will be removed. This is 42.5% of the trees growing in BZG, an unacceptable loss that is unlikely ever to be replaced in any meaningful way, not even under the Bristol Tree Replacement Standard (BTRS).
- The plan to translocate 55 trees gives no details of the proposed translocation sites or mitigation proposals in the case of failure. Translocation is fraught with risk. This has not been addressed.
- An unworkable version of the metric for Biodiversity Net Gain (BNG) has been used (BNG 3.0) for calculating Urban tree habitat. BNG 3.1 fixes this and should be used instead. This shows that the trees growing on the site account for over 70% of its biodiversity.
- The calculation of baseline and newly created Urban tree habitat is given without explanation.
- There is an assumption that only half the urban trees planted will reach full maturity. No explanation is given for this.
- The wrong Strategic Importance parameter has been used. The location and importance of the site means it has medium strategic importance, not the low importance that the applicant has given it.
- The BNG calculation fails to account for the likely delay in creating new habitat. In our calculation we have allowed for a three-year gap between the development starting and the new habitats being created.
- The applicant's proposals will result in a net 22% loss of biodiversity rather than the 38.6% gain they have stated.
- BNG submissions should include an inclusive management plan with a guarantee covering a period of thirty years including a financial budget and ecological monitoring.

The comments also requested that the Council makes a TPO covering all trees at the Zoo, as not all trees that offer significant public amenity have been recognised. This will protect those trees in the meantime.

In their final comments, dated 31.03.23, the Bristol Tree Forum provided a Biodiversity Net Gain Assessment using Metric 4.0 (BNG 4.0). These comments are summarised below.

- The Council should require applicant to adopt BNG 4.0, if not for the whole development, at least for Individual Urban Trees.
- The site should be considered to have a strategic significance of Medium for all habitat types, rather than a Low strategic significance. Whilst the site is not formally identified in the Local

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Plan, it is nonetheless of significant ecological importance, both of itself and because it is in a conservation area, is adjacent to the Clifton and Durdham Downs SNCI, is part of the wildlife corridor that connects the Downs with Avon Gorge; and it is within the IRZs of an SSSI and an SAC and within some 400 metres of Clifton Down Wood, an ancient woodland.

- The use of BNG 3.0 methodology for individual trees is infeasible because it is both error strewn and flawed. Having set the RPA radius (r) multiplier to DBH x 15 for the veteran tree T083, we have adopted the new BNG 4.0 methodology and, using the applicant's AIA tree survey data, we calculate that the baseline habitat area of the Individual trees – Urban tree on site is 6.0086 hectares, of which 2.0901 hectares will be removed and 3.9185 hectares retained. We have assumed that the DBH of each of the trees in a group is as reported for that group in the AIA. This represents a loss of 42.5% of the trees and 34.8% of their habitat from the site. We have adopted (though we do not agree) the applicant's Moderate/Poor - 87.7% / 12.3% - condition proportions and calculate that these Individual trees – Urban tree habitats combined generate 49.62 baseline Habitat units (HUs), which is nearly 88.5% of the 56.09 on-site baseline biodiversity HUs.
- Even planting all the 451 trees proposed in publicly accessible locations will not replace the urban tree habitat lost and achieve the 10% net gain which we understand the applicant aspires to. We calculate that a further 923 BNG 3.0 trees (classified as Small category trees in BNG 3.1 & 4.0) would have to be planted to achieve a Moderate condition and provide the 3.76 hectares of new Individual trees – Urban tree habitat needed to generate the minimum 10% biodiversity net gain that will also be required when the Environment Act 2021 takes effect in late 2023.
- Without these extra trees, the applicant's proposals will result in a net loss of biodiversity of 12.52%, not the net gain of 36.00% that they have calculated. We accept that a 376.35% net gain of Hedgerow units will be achieved by this proposal.

**Mall Gardens Residents Association – Objection**

- Loss of Heritage - loss of a major public amenity for Bristolians which has enriched the lives of generations for over 150 years. The retention of the area as a public amenity in perpetuity is at risk.
- Scale - large blocks of flats some as high as six stories are entirely out of keeping with the character of the area, which is a key conservation area. They are over intrusive and of poor architectural merit.
- Aesthetics - high density accommodation which threaten the heritage asset of the gardens. More time is needed for the development of ideas and broader thinking on the future of the site (eg Eden Centre, RHS)

**The Avenue Residents Association**

- The density of the proposed development is far too high. It is clear that the Zoo's only interest is to maximise profit without any regard to the legacy it will leave.
- The height of the buildings will significantly impact light on adjacent properties and will be an eyesore.
- The design of the proposed is out of keeping with existing properties, looks awful and will age in a very short period of time.
- The comments on parking are naive and frankly ridiculous. The Avenue will be clogged with residents and their visitors.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- The traffic access onto Guthrie Road will cause severe congestion and will be a safety hazard especially during busy hours at the school. Even at the moment it can take 10 minutes to access Pembroke Road from The Avenue during school drop off. There have been several near misses with school children already. There has been no consideration of vulnerable road users.

**Downs For People**

Downs for People (DfP) co-ordinated objections to the zoo using the Downs off Ladies Mile as its main car park. It challenged the licensing of this use in the High Court in 2020: this led to a court order in 2021 establishing that no part of the Downs can be used for parking for non-Downs activities from the end of 2023. DfP members have unrivalled expertise in the history of zoo parking and examined the zoo's finances in relation to successive planning applications. We are sad the zoo is closing: our objective now is to ensure that the zoo's departure benefits those using the Downs for recreation as much as possible.

**Summary**

Downs for People (DfP) has four comments on these proposals:

I. Strong statutory measures, not just planning conditions, will be needed to secure public access to the zoo grounds. If the zoo must close, Downs for People supports this application insofar as it may create public open space to complement what is available on the Downs. Recreational use in perpetuity cannot be secured by a planning condition or section 106 agreement. Something stronger, like dedication under section 16 of the Countryside and Rights of Way Act 2000 and/or designation as a town or village green under the Commons Act 2006, is required. In addition, the zoo should establish an endowment fund for future maintenance.

II. Parking history has been mis-represented as a reason for closure. In particular:

1) Visitor numbers have never been constrained by lack of parking: in its annual accounts the zoo has identified this only as a possible future risk.

2) DfP's successful High Court challenge did not result in the zoo being left with no parking. It still had its surface West car park. The zoo has decided to build housing on this. (A modest multi-storey car park there could have made up for the spaces lost elsewhere.) There is anyway still significant on-road parking in the streets around the zoo and on the Downs.

3) In 2019, before COVID struck, the zoo published a strategy to develop the Wild Place as its main site and to keep the Clifton site as a local attraction. Parking for the Clifton site was not seen as a problem.

III. The zoo has exaggerated the fall in pre-COVID visitor numbers and its financial difficulties. The zoo's finances appear healthy in its annual accounts, with profits in the three years before COVID. It described itself as 'flourishing' when it last applied for planning permission in 2016/17. Visitor numbers may be lower than in the 1960s but have not fallen dramatically in recent years. The zoo's insurers have covered most of its COVID losses. There seems no compelling financial reason to close the Clifton site other than to make money to develop Wild Place.

IV. The constraints on the use of the Downs north of the zoo – and the potential of the land - need clarification. All the land between the zoo's north boundary and the main road, including the land outside the zoo's main entrance, is part of Clifton Down. Under the 1861 Downs Act, this land must be

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

used for the public resort and recreation of Bristolians. It is also common land, to which there is a right of access on foot. The pedestrian route along the zoo boundary wall probably qualifies as a public right of way through long use.

The recreational value of this land should be maximised. The creation of a grand entrance to the proposed conservation hub and the retention of a large car park (that could only be used by visitors to the Downs) would not achieve this. The construction of large buildings on the boundary of the land would reduce the recreational value of this part of the Downs.

**RESPONSE TO PUBLICITY – STATUTORY AND NON-STATUTORY CONTRIBUTORS**

This section includes comments from statutory and non-statutory contributors. In the interests of brevity, these comments have been summarised below.

For information, Appendix 1 and 2 to this report includes a record of the representations received in respect of this planning application. Due to the limits of the Council's IT System and the number of representations received, the record of consultation responses included in the appendices is not exhaustive. However, officers have reviewed all the representations and are satisfied that all material matters raised have been adequately summarised in the report itself

- i. **Urban Design Team (BCC)** - no objection

Summary:

- Bristol Zoo is one of the earliest provincial zoos in the world and is consequently a highly significant heritage site.
- The relocation of the zoo to enable greater focus on its valuable conservation work is recognised.
- The proposals include heritage gains including improvements to the site boundaries and adaptive reuse of designated and non-designated heritage assets.
- However, the proposed new residential units within the site and the scale and massing of apartment blocks around the perimeter of the site lead to less than substantial harm (NPPF, paragraph 202) to the significance of the Clifton and Hotwells Conservation Area and setting of listed buildings within and around the site.
- Clear and convincing justification for any harm to the significance of heritage assets is required in accordance with paragraph 200 of the NPPF. The applicant has stated that the level of harm caused by the scale, massing and general quantum of the proposed development is required to ensure the delivery of the heritage gains and public benefits of the scheme.
- Revised plans and documents were submitted in late October/early November 2022, the Planning Statement and Design and Access Statement explains the key changes made. These comments respond to those submissions. A Vu.City model has also been provided, any views that have been relied upon when making these comments are included within the document.

Heritage assessment:

The site and its contents are subject to a number of local and national designations with regard to historical and cultural significance, including:

- Local Historic Park and Garden – the site
- Clifton and Hotwells Conservation Area (within)

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- The Downs Conservation Area (immediately to the north)
- Listed buildings:
  - Bristol Zoological Gardens entrance (Grade II), north west corner of site
  - Giraffe House (Grade II), south eastern side
  - South entrance gates and flanking walls, Gurthrie Road
  - Clifton College, various Grade II and Grade II\* listed buildings (to the south)
  - Bear Pit (Grade II), within the site
  - Monkey Temple (Grade II), within the site
  - Eagle Aviary (Grade II), within the site
- Locally listed building:
  - The Clifton Pavilion (west side of site, facing College Road)
  - Clifton Music School (southern tip at junction of College Road and Guthrie Road)
  - Clifton College Preparatory School (north east)
  - Houses on Clifton Down (to the west)

Significance (NPPF, paragraph 194/5)

Bristol Zoological Gardens opened in 1836 and is predated only by Paris, London and Dublin zoos. Features from the original design of the zoo survive including the entrance lodges (listed grade II), the former bear pit (listed grade II) and terrace promenade.

Later features of the zoo landscape are also surviving nationally important heritage assets such as the former giraffe house (listed grade II), monkey temple (listed grade II), Guthrie Road entrance gates (listed grade II) and eagle aviary (listed grade II).

The zoo and its landscape make a positive contribution to the character and appearance of the Clifton and Hotwells Conservation Area, it is a locally designated historic park and garden and contains the locally listed Clifton Pavilion. The zoological gardens have been an important cultural asset for the city for nearly 200 years with multiple generations enjoying visits to both the animals and high-quality planted landscape. Consequently, the site has immense communal value in addition to the demonstrable architectural, aesthetic and historic values.

This significance is recognised by the applicant in their heritage assessment and has informed aspects of the proposals such as the reuse of the entrance lodges, bear pit, monkey temple, eagle aviary, Clifton Pavilion.

Assessment of impact (NPPF, paragraphs 199-204):

The relocation of the zoo poses many challenges particularly where there are so many important aspects to the site as summarised above. The proposal offers opportunities particularly where the practical necessities of running a zoological garden in a residential neighbourhood have led to parts of the site making a neutral or negative contribution to the character and appearance of the conservation area.

The boundaries to the site, particular along Northcote Road on the east side of the site and in the middle section of the College Road boundary are proposed to be improved through this development offering an enhancement to these aspects of the conservation area.

The retention and reuse of numerous assets within the site; entrance lodges, bearpit, monkey temple, eagle aviary, giraffe house, Clifton Pavilion and the approach to the listed Guthrie Road entrance are

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

welcomed as heritage gains. Similarly, the free public access proposed to the gardens between the hours of 8am and 5pm represents a heritage benefit, given it will increase public interaction with a number of heritage assets within the site.

Despite these gains the proposals will cause a degree of less than substantial harm to the character and appearance of the conservation area and setting of heritage assets within and around the site.

This harm will be caused by the scale and massing of the perimeter residential blocks and the introduction of residential dwellings within the historic landscape.

This part of the Clifton and Hotwells Conservation Area is predominantly characterised by large Victorian residential villas that front Clifton and Durdham Downs and surrounding streets as recognised by Panoramic View 21 in the Character Appraisal. The type of large residential apartment blocks proposed for the zoo (as demonstrated in view 1 of the appendices) will consequently differ from this character and not preserve or enhance the character and appearance of the conservation area as required by the Act (Town and Country Planning (Listed Buildings and Conservation Areas) Act, 1990).

The block on the northern boundary also harms the setting of the listed entrance lodges as demonstrated in view 2 of the appendices where the current significance of the entrance lodges includes their visual dominance in the landscape despite their low architectural form.

The applicant has introduced some design changes to the scheme in light of previous comments. These have helped reduce the impact, however, introducing greater void (windows) to solid (wall) ratios and/or greater (deeper) recesses in the areas of the circulation cores particularly with the block on the northern boundary would help to break down the massing and create a more villa type appearance thereby reducing the level of harm.

The scale and massing of the other blocks around the site also causes less than substantial harm to the character and appearance of the conservation area and setting of listed buildings such as the listed Clifton College buildings on Guthrie Road as demonstrated in views at the junction of Northcote Road looking towards College Road (Local Views 26, Character Appraisal and view 3 of the appendices).

The impact on the setting of the Clifton College heritage assets is reduced in views from the south, such as from the cricket pitch, where only a slight if any impact is visible in views such as view 4 of the appendices (Long View 25, Character Appraisal).

The proposed 'lake house' villas within the zoo landscape are architecturally interesting buildings that complement the design aesthetic of the retained zoo buildings. However, by introducing private residential dwellings to what is currently a quality landscape that is perceived as public will cause cumulative harm to the conservation area and local historic park and garden. This harm will be caused by the introduction of vehicular movement and car parking to what is currently a largely vehicle free landscape. These private dwellings and their associated aspects will change the perception from being a public to a private landscape impacting the communal value of the site as well as the landscape qualities. This will be particularly evident when looking into the site from College Road (view 5 of the appendices, also identified as Local View 21 in the Character Appraisal) where the landscape will appear to be a private residential street as opposed to a public historic landscape.

The proposed northern block will not materially harm the significance of the Downs Conservation Area due to the topography of Downs and the screening provided by the existing trees.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**Urban Design:

The height, scale and massing of the development has been assessed in relation to heritage assets and the character of the area, the harm associated with this has been discussed contrary to policy DM26 and 27. The layout directs the majority of the development to the site's edges reinforcing the 'walled' character of the site. With regard to policy DM28, the development will create a safe, attractive, high quality, inclusive and eligible public realm, both within and outside of the site. As distinct new part of Clifton, the new buildings as proposed will introduce high quality materials to the townscape in accordance with policy DM29.

Conclusion:

Clear and convincing justification for any harm to the significance of heritage assets is required in accordance with paragraph 200 of the NPPF. The applicant has stated that the level of harm caused by the scale, massing and general quantum of the proposed development is required to ensure the delivery of the heritage gains and public benefits of the scheme. These heritage gains include the retention and reuse of the various heritage assets (designated and non-designated) and enhancement to aspects of the conservation area as detailed above.

Public benefits provided by this scheme that can contribute to the planning balance as defined by paragraph 202 of the NPPF include; free public access to the gardens and a cultural strategy that will encourage greater community use of the assets. Planning conditions and agreements will be required to secure these benefits should this proposed development receive consent.

Archaeological conditions to secure the recording of the heritage assets prior to and during the development works will also be required in accordance with paragraph 205 of the NPPF and Supplementary Planning Document 7. This should include the pre-commencement condition to secure an archaeological programme of works and historic building recording and watching brief conditions.

ii. **Flood Risk Management / Lead Local Flood Authority (BCC) - no objection**

This is a good SuDS strategy for the site. I would recommend that the SuDS condition be applied to cover the detailed design once prepared and ready. There are still drainage surveys to be conducted and details to be confirmed but it does show that this development can be drained in a sustainable way and provide wider sustainability benefits. It also demonstrates that flooding occurring from the extreme future case rainfall event could be controlled in a suitable way. The only minor point standing out is the relatively small orifice diameter proposed for the online control at 64mm which could more readily lead to blockages and consequently cause flooding problems. This should be manageable with appropriate controls such as filtration devices put in place to help prevent this though. A maintenance schedule with routine checks would also help enable this.

iii. **Nature Conservation (BCC) – no objection**

The Bristol Zoo Gardens Site is located in a semi-urban area adjacent to the Clifton and Durdham Downs Site of Nature Conservation interest (SNCI), though is not considered this proposed development will have a direct impact to this site. The site is not within a wildlife corridor (part of the Bristol Wildlife Network).

The Ecological Appraisal (EA) (The Landmark Practice, October 2022) sufficiently addresses the ecological features of the site by providing the results of extensive surveys, and outlines appropriate

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

protection, enhancement, and mitigation measures required for this proposed development.

The proposed scheme will likely disturb, damage or destroy up to 14-day bat roosts. All roosts identified are summer day roosts used by common species in low numbers. In order to proceed with the proposed development legally, a licence from Natural England will be required. An outline mitigation strategy and method statement (MSMS) has been included in the EA by The Landmark Practice (TLP). Conditions below regarding works affecting bats and/or their roosts do not conflict with the outline MSMS. The proposal would not be detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range. Justification has been provided by the applicant to demonstrate how the three tests required to be met by the Local Planning Authority to comply with the legal protection afforded to European protected species (in this case bats) are considered to be met, and it is anticipated that a license from Natural England will be granted. The license application will conclude how the three tests are met in detail. This is for the planning officer to make final judgement.

The submitted Biodiversity Net Gain Report (BNGR) (The Landmark Practice, October 2022) shows that a 39.86% gain in habitat units and 376.35% gain in hedgerow units will be achieved through the proposed landscaping scheme (11585-LD-PLN-300 REV B, Land Use Consultants). The proposed urban trees within the BNG metric represent half of the proposed urban trees on site, assuming that only half of all proposed trees will reach full maturity to factor in the various risks to the longevity of trees within the site, including those within private gardens. For transparency Bristol City Council (BCC) and (TLP) agreed that the BNG metric was re-run, removing retained and proposed trees in private gardens as their maintenance to desired condition cannot be guaranteed for 30-years (as required by the Environment Act 2021, schedule 7A, Part 1, paragraph 9). TLP provided re-run BNG calculations removing these trees which resulted in a drop from 39.86% to 36% gain in habitat units. BCC accepts the cautionary approach to inputting urban tree habitat into the BNG metric and acknowledges the minor reduction in the BNG calculation.

The first BNG report submitted with this application (dated on planning portal May 2022) states the BNG assessment commenced in July 2021 when metric 3.0 was the most recent version of the metric. The Natural England publication page for BNG metric 3.1 (published on 21st April 2022, link) states:

*“Users of the previous Biodiversity Metric 3.0 should continue to use that metric (unless requested to do otherwise by their client or consenting body) for the duration of the project it is being used for as they may find that certain biodiversity unit values metric 3.1 generates will differ from those generated by Biodiversity Metric 3.0.”*

The Natural England guidance on the latest BNG metric (4.0) publication page states: “Projects currently using biodiversity metric 2.0, 3.0 or 3.1, as well as those using the beta test version of the Small Sites Metric, are advised to continue to do so unless requested otherwise by their client or consenting body as the biodiversity units values generated by these metrics can differ from each other and may differ from the more current version 4.0 of the metric.”. It is acknowledged that it is for the consenting body, in this case Bristol City Council, to make judgement on this. The BNG metric submitted with this application (metric 3.0) was the most recently published metric by Natural England at the time it was completed, and was completed using user guidance provided by Natural England at that time for that metric. This is consistent with the guidance in place at the time. BCC therefore finds it to be a disproportionate response to require a BNG assessment that was completed in line with the current metric and guidance of its time to be re-assessed at a later stage. Furthermore, the ‘summary of changes’ documents on the 3.1 and 4.0 publication pages state that the changes between the metrics are “unlikely to have a significant impact on the range of overall outputs generated” therefore it would not be considered an appropriate response to request that developers change metrics part way through a project considering the Natural England guidance provided, the professional judgement made, and the fact that the BNG metrics published to date are not yet regulatory requirement until November 2023..



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**The Habitat Regulations (Screening and Appropriate Assessment)

TLP provided a shadow Habitats Regulations Assessment (HRA) which considered the likely significant effects (LSE) of the proposed development on National Site Network Sites within 10 kilometres (stage one screening) and Appropriate Assessment (AA). The shadow HRA concluded that no LSE are anticipated via noise, visual or hydrological/drainage to the Severn Estuary European Marine Sites, and no LSE are anticipated on the qualifying features of the North Somerset and Mendip Bats Special Area of Conservation (SAC). In the absence of mitigation, the proposed development has the potential to result in LSE upon the Avon Gorge Woodlands SAC as a result of potential air quality impacts from increased dust generated from the movement of lorries to and from the proposed development site, known as “track-out routes” during the construction phase. The Air Quality Assessment produced for this proposed development (Hydrock Consultants Limited, 2022) concludes that: *“Overall, the Proposed Development is considered to be Medium Risk for nuisance dust soiling effects, Low Risk for PM10 health effects and to be Medium Risk for ecological impacts, in the absence of mitigation.”*

The AA considers whether a plan or project could result in an Adverse Effect on Integrity (AEoI) of one or more National Site Network sites, either alone or in combination with other projects. Mitigation measures to reduce the risk of impacts to the Avon Gorge SAC during construction are outlined in appendix A of the Air Quality Assessment (Hydrock Consultants Limited, 2022) and are recommended to be conditioned within a Construction Environmental Management Plan below. With the specified mitigation in place to protect the Avon Gorge SAC, there would be no anticipated AEoI on a National Site Network site within 10 kilometres of the proposed development and the AA concludes that there is unlikely to be an AEoI to the Avon Gorge Woodlands SAC from in-combination effects between the proposed development and three other large-scale proposed developments in the surrounding area.

Natural England’s feedback on the shadow HRA also states that: *“We consider that the proposals include mitigation to ensure that the proposal will not result in an increase in recreational pressure on the SAC, the proposals provide onsite greenspace which exceeds BCC’s open space quantity standards.”*

The shadow HRA/AA is adopted by BCC as competent authority.

If this application is deemed to be approved, conditions are recommended.

iv. **Arboriculture Team (BCC) – No major objections**

Summary: The supporting documentation for the revised scheme has answered most of my concerns. No major objections are made, but concerns are held regarding:

- The juxtaposition between the shading from the proposed new dwellings of the lake houses, the museum and parrot house on important retained trees. The shade analysis demonstrates the rear gardens will not receive the minimum of 2 hours direct sunlight recommended by BRE during the winter months. This is outside of my field of expertise, and I can only recommend this is assessed prior to determination (*this is assessed within Key Issue C.v*). To remedy my concerns, I propose a further tree preservation order is placed on the trees in and around the rear gardens prior to occupation following an amenity assessment.
- Further detail or clarification on the location of street lighting columns and the underground water management/ water attenuation systems proposed, albeit these details can be secured by condition.

The site: Bristol Zoo gardens is a historic destination site with a rich history of landscape planting that has a diverse population of native and oriental species with an uneven age range from young to over

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

mature providing a high-quality landscape. This has resulted in 19 trees recorded on the national tree register of champion trees. During the initial pre-application 21/04914/PREAPP; an amenity assessment of the site was conducted to identify the highest quality trees; that in the current context should be protected by a tree preservation order to secure them into the future. Tree Preservation order 1438 was confirmed on 20th October 2021. Many of the trees on site are rare and unusual species that, although they are not climax landscape trees are an important and intrinsic part of the character of Bristol Zoo Gardens and the wider Clifton and Downs conservation areas.

Tree Survey: The supporting Arboricultural Report is an assessment of the 218 trees & 45 tree groups on site. The details presented within the Arboricultural Implications Assessment and Method statement are reasonable. A number of conditions should be applied to secure the working methodologies through the development process.

Tree Preservation Order: Tree Preservation order 1438 was an initial amenity assessment of the landscape trees within the current context of the zoo gardens prior to any planning applications being made to ensure the highest quality landscape trees were a material consideration during the planning process. Following the completion of the development a further amenity assessment should be undertaken to assess the changing public amenity of the remaining trees, the re-development of the site will allow public access during the day and the addition of new homes, pedestrian paths and the remodelling of the lake may increase the amenity value of trees. Additional pressures from the new dwellings on adjacent trees with a high amenity value should be further protected. T15 Loquat (*Eriobotrya japonica*) has been proposed for removal to facilitate the development of the perimeter apartments on the northern boundary of the site. The tree is located within very close proximity to the western elevation of the Twilight World building. Translocation of the tree would be very hard to achieve and therefore its loss is regrettably necessary if the proposed is consented. Within the landscape plans 3 replacement *Eriobotrya* have been proposed to secure this species longevity within the development.

Veteran Tree: T83 Hawthorn is the only veteran tree on site. There are other large trees but they do not have sufficient stem diameters or veteran characteristics to be considered veteran trees in accord with NPPF 180. Having reviewed the proposed design details which include 'no dig' measures within the Root Protection Area (provided 23.03.23), no objections are raised in relation to this tree. This solution needs to be implemented at every location where a tree root protection areas extend into the highway and a 'no dig' solution has been proposed within the supporting arboricultural method statement and not just adjacent to T83. Full design details can be secured by condition. Following the receipt of this design detail and provided the supporting arboricultural method statement is followed, no detrimental impacts on T83 are envisaged in accord with NPPF 180c.

A full list of registered trees and those trees subject to the TPO is included within the Arboricultural Team's comments.

Tree Register trees: The site is fortunate to have 19 registered trees, 5 National Champions, 11 County Champions and 4 remarkable trees. Although these are recognised trees of note many of them are in a declining condition or located in less-than-ideal landscape locations. Two county champions *Malus florentina* & *Metasequoia glyptostroboides* have been removed historically prior to any application being made. The Tree Register trees enhance the character of the proposed development and maintain a link to the historic land use as a zoological garden. The loss of the *Malus florentina* & *Metasequoia glyptostroboides* prior to the application process and the further loss of trees

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

T17 *Zelcova serrata* 'Village Green' & T180 *Photinia serratifolia* are a significant loss. Within the landscape plans 1 *Zelcova serrata* 'Village Green' & 3 *Photinia serratifolia* have been proposed to secure this species longevity within the development.

Translocation of trees: 2 trees protected by TPO 1438 have been identified for translocation: T72 *Paulownia fargesii* & T87 *Liquidambar styraciflua* 'variegata'. This is a complex process of moving semi mature trees that does not guarantee successful establishment. Within the landscape plan 4 (South) *Paulownia fargesii* & 1 *Liquidambar styraciflua* 'variegata' have been proposed to secure this species longevity within the development. 44 trees have been identified for translocation these are made up of *Dickinsonia antarctica*, *Trachycarpus fortune* & *Cordyline australis*. The Soft Landscape – Key Plan has suggested 58 trees of a combination of these species will be planted and that 44 will be through translocating trees currently present on site; there locations have been presented on the 4 landscape planting plans. The translocation of these species is more feasible than broadleaf trees due to their root morphology, as such there is no objection in principle.

Shading and Fenestration: Due to the dense population of trees on site the shading by trees has been a concern through the pre-application process. The revised scheme has provided a BRE sunlight assessment for the rear gardens with consideration with regards the impact of existing mature trees. The main areas of concern are the rear garden of the lakeshore houses and the former museum, The Parrot house & the grand terrace.

The lake shore houses have been designed in a semicircle which hugs the southern bank of the lake. These dwellings consist of 3 & 4 storey town houses with large trees in close proximity to the rear gardens and the lake. The large trees are imposing features within a new residential setting that have the potential of causing a perceived risk of harm as well as the loss of light to gardens. The shade analysis shows none of the rear gardens will receive at least 2 hours of direct sunlight during the winter months whilst the sun tracks close to it nadir; whether this is acceptable in planning terms is outside of my field of expertise but needs to be addressed prior to determination of the application. The BRE guidance does not consider that trees present a significant contribution to shading of dwellings. I would propose that the remaining trees located in the rear gardens are protected by a tree preservation order following a condition and amenity assessment to ensure the local planning authority are able to manage the level of works undertaken following occupation of the Lake houses. The increased access to the site would justify the elevated amenity the trees would provide, I consider it is expedient to apply an additional tree preservation order due to the potential threat of over management due to the available light levels within the rear gardens. The application of a tree preservation order prior to occupation would provide clear guidance to purchasers of the dwellings that the trees are features within the garden and can not be managed or removed without significant justification.

The overshadowing analysis in December indicates that none of the garden will receive at least 2 hours of direct sunlight. As mentioned above this is due to the sun being low in the sky and the tree will only cause marginal additional shadow over the winter months. The shade analysis again shows that the none of the rear gardens will receive at least 2 hours of direct sunlight during the winter months. This needs to be addressed prior to determination. A majority of landscape trees to the north of the gardens are already protected by TPO 1438; however I would consider further assessment of trees T38, T41, T43, T45, T63, T64 T138 & T139 prudent to establish whether further protection should be afforded to these trees prior to occupation.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Tree Loss: 80 trees, 31 groups or part of and 3 hedges are proposed for removal to facilitate the proposed re-development. A detailed assessment in accordance with the Council's tree compensation standards set out in Policy DM17 and the Planning Obligations SPD has been presented; 192 replacement trees are necessary to mitigate the loss. The landscape plan proposes 461 replacement trees with the translocation of a further 44 trees to maintain the mature character of the landscape. The landscape proposal fully mitigated the Council's tree compensation requirements. The landscape plans should be revised to show the final locations for the 44 translocated trees. I acknowledge that a large number of trees will be lost as a result of the proposal, but in general most of these trees are of average quality. Further, the retained trees are generally those of highest amenity value and quality.

Arboricultural Methodologies:

Tree protection - a phased tree protection programme has been proposed. Whilst phasing tree protection is not ideal due to complexity, given the size of the site and high number of retained trees there does not appear to be a more simplified way of approaching the tree protection. Arboricultural supervision will be necessary and should be conditioned.

Ground protection - the report recommends a ground protection plan to present the access routes and weight of vehicles over root protection areas during the different phases of construction. This plan can be conditioned as a pre-commencement condition to secure the information.

Cellular Confinement - the installation guidance for Cellweb has been provided within the Arboricultural Method Statement. Further information should be presented that identifies the expected weight of vehicles on these areas, specifically the road network in relation to rubbish collection vehicles and emergency services so that the correct thickness of cells can be installed to distribute the weight of heavy vehicles across the road network.

Services and Underground Utilities - A Combined proposed services and RPA Plan has been provided that shows the location of all of the major services. 9 precautionary areas have been identified within the Root protection areas (RPA) of trees T6, T26, T27, T38, T56, T57, T138 & T139. None of the encroaching services are to an extent that could significantly affect the condition of the retained trees and working methodologies have been provided within the arboricultural method statement. I have not been able to identify the locations of street lighting columns which have the potential to adversely affect the future management of retained trees and the landscape plan. 7 red dots with FH next to them are present which may represent the street lighting columns; if so the column adjacent to T138 is likely to cause a future conflict with the trees canopy depending on orientation. The Landscape Strategy recommends extensive rainwater harvesting, Suds and water attenuation systems. All of which are below ground systems that have the potential to adversely affect the root protection areas of retained trees. The drainage plans (Price and Myers) generally suggest that drainage will avoid the RPAs of retained trees, but there are some locations where conflict with RPAs is possible, and hence a revised arboricultural method statement is needed and can be secured by condition. Further, the Landscape Statement indicates rainwater harvesting will be implemented but full detailed plans have not been provided. As a precaution, a revised arboricultural method statement should include details of any rainwater harvesting systems to support the landscape trees. The plan shows the northern lawn covered in circles; can you request clarification of what these are. There locations have the potential of affecting trees T125, T126, T127, T142 & T147.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Landscape: The Landscape Strategy is a detailed document that discusses the history of the landscape since the inception of the zoo gardens through to the present day. The design concepts of tree lined streets and deep planting beds with a mixed vertical planting structure will increase the species diversity and provide enhanced habitats for wildlife. Any landscape proposal needs to form part of a well-balanced public realm scheme which is outside of my field of expertise and therefore I cannot comment on how the proposed landscape addresses any public realm comments. I'm unsure whether street lighting has been identified within the services plan; in my experience street lighting is one of the major conflicts with new tree planting due to canopy sizes and street lighting requires relating to column heights and light throw from each column. A street lighting plan needs to be undertaken that compliments the landscape proposals. The planting plans 1-4 and soft landscape key present a well-balanced tree planting scheme with a diversity of tree families, genus and species that assists in future proofing the site from the effects of climate change and genus specific tree pathogens. Replacement planting for the lost Tree Register trees and translocated TPO trees have been included which maintains the species presence on site which is well received.

Relevant policies and guidance: NPPF paras: 131, 174, and 180. Policies BCS9, DM15, and DM17.

No ancient or veteran trees will be adversely affected by the proposed.

The proposed seeks to improve the existing management of green infrastructure across the site with additional tree and herbaceous planting which is supported in part by Suds, water attenuation and rainwater harvesting solutions. A strong framework of street trees is proposed.

The landscape plan fully mitigates tree loss in accordance with the planning obligations SPD. The most important trees on site, those on the Tree Register and those protected by TPO 1438 have been retained or translocated (Except T15).

Conclusion: The proposed scheme, as a whole, provides a well-balanced assessment of the existing trees and how the addition of new planting can complement the future development of the site.

The supporting Arboricultural Report provides a detailed assessment of the scheme as well as working methodologies where development could adversely affect the retained trees.

The re-development of the zoo gardens will require the installation of substantial services, utilities and water management systems that all require excavation to industry specific depths and distances from other systems. The Combined proposed services and RPA Plan has addressed the locations of a majority of services; I have to question whether the street lighting has been presented. I also wish further detail on the water management system and its locations; this could be a pre-commencement condition, however.

The shade analysis has confirmed that the rear gardens of both the lake houses, the museum and parrot house do not get 2 hours of direct sunlight during the winter months which you would have to address because this is outside of my field of expertise. I still consider that the trees in the rear gardens and in close proximity to the rear gardens are at risk of increased pressure to prune or remove following occupation and therefore I have proposed to undertake a further amenity assessment considering their location post development and decide whether a further tree preservation order in these areas would be expedient.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

I would still like further evidence on the location of street light columns and the water management system across the site. These are however potentially pre-commencement conditions if you are minded to take the application to committee as it is.

Bristol zoo are unlikely to be the developer of the site and it is my understanding that the site will be sold with full planning consent in place. Due to the change from pro-active design and aspiration for the site there is uncertainty whether the purchasing developer will have the same aspirational concerns. Below is a list of condition I would apply to any decision notice if you are minded to recommend granting permission at committee; full conditions will be provided prior to committee.

Additional Information Required:

Street lighting plan – Location of lighting and how these effects proposed landscaping

Water management plan – underground location of services within the root protection of retained trees.

This can however be secured by condition.

v. **Sustainability Team (BCC)** – No objection

The Team's final (third) comments outline that the recently submitted information addresses the concerns raised in the Sustainable City Team's previous comments.

The Team's initial and second comments are summarised below:

BCS13 – Climate Change: Overheating modelling shows overall a good level of resilience to overheating under future weather scenarios. Though some risk is identified in 2050 and 2080 this can be mitigated with increased window opening. Cycle parking, EV charging, and car club provision are all proposed in line with policy to support more sustainable transport options. Extensive green infrastructure is proposed to improve biodiversity of the site, alongside a range natural water management features. There is a strong focus on multi-functional benefits of landscaping.

BCS14 – Energy: Very good U-values and air tightness are proposed with high efficiency LED lighting and MVHR with summer bypass throughout. Fabric improvements and connection to the local heat network are proposed for all existing buildings that are to be refurbished for dwellings. The overall heat strategy is well considered and the use of different heat pump sources to feed a local low temperature network offers a low carbon approach that is supported. In response to concerns regarding the use of electric boilers, further information has been provided, explaining that increasing the number and/or size of the heat pumps to meet the peak demand would add significant building mass and mean the loss of PV and green roof area. The peak demand figure has been calculated using CIBSE heat network code of practice methodology. This is considered acceptable, there are no further objections to the use of electric boilers in this instance given the small proportion of demand and the usage as part of a low carbon site wide heat network. Though heat networks are treated as an energy efficiency measure for the purpose of BCS14, heat pumps are considered a renewable technology. Therefore, although in the energy calculations only PV is counted towards the carbon reduction from renewables, in fact the renewable energy generation on site is greater than is illustrated by this figure. Extensive photovoltaic panels are proposed across the site to further reduce carbon dioxide emissions from residual energy use.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

BCS15 – Sustainable design and construction: A BREEAM communities scoping assessment has been undertaken as required, and all BCC recommended credits and some additional credits deemed to be relevant. The development meets the principles set out for the relevant credits. This demonstrates that wider sustainability principles are being considered across the project. We are pleased to see that a structural embodied carbon assessment has been undertaken to inform early design choices. A target 'grade E' SCORS rating has been set and not all areas are anticipated to meet the target based on current plans. Whilst we welcome the embodied carbon assessment provided, we reiterate our previous point that the targets set are not stretching and do not align with established industry good practice. BCC's new draft local plan policies have now been published for consultation and, if adopted, new development will be expected to achieve them. We note that further efforts will be taken at detailed design stage to reduce embodied carbon and strongly recommend that the development aims towards the targets highlighted above. However, as no embodied carbon targets are set in adopted policy, we do not consider this to be a compliance issue. The requirements of BCS15 are met in other areas including good practice targets for water efficiency, an extensive sustainable drainage plan, provision of biodiverse green roofs, and specific targets in relation to waste and responsible sourcing of materials.

Recommended Conditions: conditions are recommended to secure: energy and sustainability statements, photovoltaic panels, heat pumps, and air tightness.

vi. **Air Quality Team (BCC) – no objection**

Final Comments: I have reviewed the revised air quality assessment. There is no predicted significant adverse impact on air quality arising from the development. I therefore have no objections or comments.

Initial Comments: The air quality assessment concludes that, as the development will result in a net reduction in traffic movements, and that no new exposure will be introduced, the impact of the development on air quality is insignificant. I therefore have no objections to the development in terms of air quality.

vii. **Land Contamination (BCC) – no objection.**

Overall, no objection to the proposed scheme on the grounds of contaminated land as long as conditions are secured for further site investigation and risk assessment in the event planning permission is granted.

viii. **Transport Development Management (BCC) – No objection subject to conditions and planning obligations.**

The information provided by the applicant is sufficient to secure support from TDM subject to obligations and conditions

TDM support the application because:

- The proposed development is consistent with national and local transport policy.
- The location of the site is accessible to pedestrians, cyclists, and public transport users.
- Site permeability to pedestrians also integrates the site with the surrounding pedestrian routes.
- Access to services, education and employment areas are within walking and cycling distance of the site, which is in line with local and national policies

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- Satisfactory vehicular access can be achieved from College Road, Guthrie Road and Northcote Road. The provision of three vehicle access points distributes vehicles both around the site and local road network to minimise traffic impact. The details of which will be subject to S278 agreement.
  - The internal site layout is able cater for all road users including service vehicles as shown by swept path analysis.
  - The level of car parking proposed is suitable for the location of the site given that local facilities are accessible by foot, cycle, and public transport, and that on-street parking is controlled by a residents parking zone for which new residents would not be able to purchase permits.
  - The sustainable travel measures proposed including secure cycle parking in excess of the minimum standards, car club car, and the implementation of a Travel Plan at the site further would encourage the use of alternative modes of transport to the private car, reducing car parking demand.
  - Comparing average traffic generation, the proposed traffic generation of the development would be less than the existing BZG traffic generation therefore there is a net traffic benefit of the scheme compared to the existing use of the site. This would also be the case when considering the cumulative impact of both the residential schemes at West Car Park and BZG.
  - The proposed scheme would generate substantially lower levels of traffic than from the BZG use on peak BZG visitor days.
  - There are no road safety concern on the local road network and there is no reason to suggest that that proposal would affect this situation.
- ix. **Housing Enabling Team (BCC)** – No objection. The final comments do raise some queries concerning M4(3) units and parking arrangements for the affordable housing units.

Affordable Housing Requirement

The Council's planning policies for affordable housing in Bristol are set out in Policy BCS17: Affordable Housing Provision in the Core Strategy Local Plan (Adopted June 2011), and Policy DM3: Affordable Housing Provision: Smaller Sites in the Site Allocations and Development Management Policies Local Plan (Adopted July 2014). Further guidance on the practical application of the Council's affordable housing policies is set out in the Affordable Housing Practice Note 2018 (AHPN).

The site falls within Clifton ward, which is in Inner West Bristol. In accordance with policy BCS17 the site is required to deliver 40% affordable housing, which is 78.4 units out of the 196 units being delivered. However, the site is eligible to make use of the 'Threshold' approach to BCS17 added by the AHPN that applies to the Inner East and West areas. This would require the site to deliver a minimum of 20% 39.2 (40) affordable housing providing the applicant agrees to certain criteria.

In order to take this 'Fast Track' route the applicant will agree to:

- Commence the development of the scheme within 18 months of the permission being granted;
- A viability testing process if no confirmation of commencement of the development of the scheme has been received within 18 months of the date the planning permission was granted.

The applicant has suggested that they will take this option and offered 40 units as affordable housing which is compliant with the 'Affordable Housing Practice Note' fast track option.

Tenure



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The applicant has currently offered the Council's requirement is 75% Social Rent and 25% 'First Homes' which is acceptable. Ordinarily we would wish to see a mix of property types, however to remain within the £250k cap on First Homes, due to house prices in the area, it is understood why 1 bedroom properties have been selected, to remain within the cap.

As the application stands there is a proposed 10 First Homes which are located in Block E and 30 Social Rent units in Block S.

The City Council seeks to secure affordable housing that is well integrated within a mixed tenure development. Where high density flatted developments occur, the Council has needed to offer some flexibility to Registered Providers where they have found it easier to ensure affordability by having control of common areas in one block and the minimisation of service charges. That said, where opportunities exist and where a development comprises of flats and houses it remains the Council's preference to see a range of different size, type of dwellings, integrated across the whole development.

The Council acknowledge that due to the many constraints including heritage matters relating to the former Bristol Zoo site that the resultant design has fewer opportunities to incorporate family homes as the Council would have wished. On this occasion for the reasons indicated, the Council is willing to accept the provision of family apartments and given the layout of the development, accept on this occasion, (as with high density developments) that the affordable housing is spread between three blocks.

#### Unit size and type

There is little affordable housing in Clifton ward and while this contribution does not provide the ideal range of dwelling types, the development goes some way in providing much needed affordable housing in the area.

The affordable housing at the site is split across three separate blocks. The S1 block contains 30 units comprising 75% of the scheme. The remaining 25% of affordable units in the form of First Homes are distributed across separate blocks within E2 and E3 and are mixed with private tenure.

We welcome and can confirm the applicants present application does meet Nationally Described Space Standards across the affordable units.

There is a high demand in the City for affordable housing for people with disabilities. The 2018 Urban Living SPD recommends that 90 per cent of new build housing meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation M4(3) 'wheelchair user dwellings. Whilst the applicant has not reached the Urban Living SPD recommendations for accessible dwellings, they have met Policy DM4 which requires 2% of new housing with over 50 units to be designed as wheelchair user dwellings. We note that two of the M4(3) units are on the first and second floor, we would like to see confirmation that the pathway to these flats is fully accessible for a wheelchair. This should include automatic doors throughout the pathway from the entrance of the block to the front doors of the M4(3) flats. We would also like these plans to be reviewed by our Accessible Homes Team to confirm that the dwellings will meet a lettable standard to a wheelchair user.

Under the present proposal, one of the 4 proposed M4(3) units is for private sale. Unless the applicant is actively intending to market to someone with adaptable needs, we'd recommend this is amended to become an affordable housing unit where we are confident we would be able to find someone who requires an accessible home.

#### Car Parking

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

At present it appears that the only parking offered for the affordable housing is for the accessible units. As the site is in a central location and there are a good range of transport options this will minimise some of the need for private parking, however there will still be a requirement for provision beyond those spaces provided for the 'accessible units'. We would expect an approved plan to be provided and to be agreed with the Council, with the inclusion of further parking spaces for the affordable units. We would recommend that 10% of the parking spaces are allocated to the Registered Provider who can either independently or in conjunction with the landowner, devise a fair scheme for their allocation to 'affordable housing' residents. We would wish to see this secured in the S106 Agreement.

Approved Housing Provider

The developer is expected to provide affordable homes on site without any public subsidy. The affordable units should be transferred to a Registered Provider who is a member of the Homes West Partnership.

Rents & Service Charges

Rents for Social Rented units should be set according to the relevant government formula, further information is here.

The service charge is the amount payable on an affordable housing unit in addition to the rent/mortgage due. It should include all estate management charges, ground rents, services, repairs, regular maintenance items such as cleaning and grounds keeping, and the insurance of the building. Sinking funds may be charged additionally to service charges. Sinking Charges should only be set to recover the replacement costs of items or areas of the building at their expected end of 'life' as part of programmed repairs for the building.

To ensure the relative affordability of units, total service charge costs should not exceed £650 for an affordable unit. This figure is benchmarked to 2018 and can be inflated by CPI annually. The total costs of rent + service charges for all affordable units must not exceed the current Local housing Allowance rates, this may mean that the services charges cannot be raised in certain years.

Early consultation is recommended, as good design can overcome the need for high service charges.

Where schemes are facing particular difficulties remaining within the cap, such as, but not limited to, needing additional requirements through the planning process, or delivering a complex site with additional costs, exemptions can be requested via the Strategy and Enabling team to raise the cap level. These will be reviewed on a case-by-case basis and should be requested at the earliest possible date in the development process.

Developers/ development management companies must not make profit on service charges and can only charge costs that are reasonable to the services they deliver.

Enabling Fee

An Enabling Fee will be payable when each affordable home is substantially completed. These fees are designed to maximise affordable housing delivery in the city by assisting registered providers with support on planning, property and highway issues.

A fee of £570 per affordable home index linked from 1 October 2017 will apply.

The fee is paid to the Council on substantial completion of each of the affordable homes and applies to Social Rent, Affordable Rent, Intermediate Rent and other Intermediate affordable housing tenures

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

procured through s106 negotiations and delivered without public subsidy or through re-provision/remodelling, extra care housing and 100% affordable housing schemes

x. **Public Art Team (BCC) – no objection**

General support for the updated cultural strategy and approach as submitted by Gingko in line with the altered proposals:

- In support of extension of public opening times from 8am - 5pm, with opportunity for curated events in the evening
- In support of the enhancement of the public experience through increasing the permeability of the edges (more entrances) - culture and public art could play a strong role here in welcoming public into the site.

A condition to secure the full public art plan in accordance with the submitted Outline Public Art and Culture Strategy is recommended.

xi. **Pollution Control (BCC) – no objection**

Second Comments: Following the submission of further documents regarding this application, including a noise assessment and comments in the planning statement regarding Clifton College Music School I would comment further on noise as follows: I am happy with the noise assessment and would agree that if 'the mitigation measures and design requirements outlined in this report are implemented, the development will meet the requirements of National and Local Policy'. The noise assessment does not however make any assessment of noise from Clifton College Music School. Noise from the school is mentioned in the planning statement which finds that based on a number of assumptions finds that noise from the school should not be an issue or can be suitably mitigated against. I would agree with this but as this is largely based on assumptions and probabilities, I do feel that further information will be required by condition. I would therefore ask for the conditions requiring an assessment of noise from the Music School, together with the implementation of any mitigation measures deemed necessary, as well as a requirement for sound insulation of the residential properties in accordance with the Noise Assessment.

Initial Comments: No objection, conditions are required to ensure the redevelopment does not pose harm to existing neighbours through construction activities, and harm is not caused by the community/commercial uses.

xii. **Building Bristol, Employment and Skills – no objection**

Building Bristol acknowledge the Employment and Skills statement submitted by the applicant committing to the use of a local employment and skills plan. Should permission be granted please ensure the following Pre-Commencement condition is included in the decision and that the £2000 Section 106 obligation fee is collected.

xiii. **Economic Development (BCC)**

Final comments: The resubmitted Economic Benefits Assessment document represents a reasonable estimate of the potential economic benefits of the proposal.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Initial comments: While the applicants have largely addressed our comments made at pre-application stage, and while they have outlined the benefits to the city's wider economy, the proposal could be strengthened by being more explicit about the benefits to designated centres in the more immediate vicinity of the site.

- xiv. **Natural England (statutory consultee)** – no objection subject to the appropriate mitigation being secured.

## Final Comments:

Thank you for consulting Natural England on the revised Shadow HRA (The Landmark Practice, February 2023) for 22/02737/F.

The addition of the development of 62 dwellings at Former Car Park, College Road, Clifton does not change the justifications the applicant has made regarding recreational pressure from the application and our previous comments on the Shadow HRA still apply.

However, this addition results in the overall development being higher density and will result in more pressure on local services including local greenspace. This may justify a more significant contribution to management of greenspaces in the vicinity but outside of the red line boundary.

## Second Comments:

Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

## Avon Gorge Woodlands SAC

The Shadow HRA screens in a likely significant effect to the Avon Gorge Woodlands SAC due to dust generated from construction vehicles moving to and from the application site on roads within 50m of the SAC. We concur that the mitigation measures in Section 12 of the Shadow HRA will be sufficient for construction vehicle dust to not result in an adverse effect on the integrity of the SAC.

Regarding recreational pressures on the Avon Gorge Woodlands SAC, Natural England have advised Bristol City Council in our recent response to their draft local plan that recreational pressures at the SAC must be assessed and is likely to result in a Likely Significant Effect on the SAC. This is consistent with the conclusions of the HRA Scoping Report produced for the WECA Spatial Development Strategy. We consider that the proposals include mitigation to ensure that the proposal will not result in an increase in recreational pressure on the SAC, the proposals provide onsite greenspace which exceeds BCC's open space quantity standards.

## Other Designated Sites

Natural England concur with the conclusions of the Shadow HRA regarding the North Somerset and Mendip Bats SAC and the Severn Estuary SPA/SAC/Ramsar.

All of Natural England's comments can be reviewed within the Appendix/Supporting Documents to this report.

- xv. **Historic England (statutory consultee)** – no objection

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Third Comment: The additional information and minor amendments have no material bearing on the advice which we have previously given (“Second Comments”). I therefore refer you to our previous letter of 23 November 2022 (our reference L01508753), the comments of which still stand.

Second Comments:

While the proposals are found to be a sensitive response to their historic context, a considerable aspect of the site’s significance is bound up in its continued use as a Zoo since the early 19th century. The closure will have a pronounced harmful impact on the significance of the site. The loss of the Zoo from the site is partially mitigated through good design, retention of much of the historic planting and landscape, and allowances made for future public access. There are some heritage benefits to the proposals, especially the removal of later accretions to the listed structures, and the restoration of those buildings.

In response to the initial proposal, Historic England advised that the upward extension to the Clock Tower building and façade of Block S2 on Guthrie Road could be improved, in order to preserve and enhance the character and appearance of the Conservation Area. The submitted amendments proposals addresses these concerns, and these buildings suitably address the Conservation Area and context. Amendments to the northern block represent an improvement, and the new openings introduced within the walled perimeter strike an appropriate balance the preservation of the walled perimeter with the desire to invite users to enter the site. Overall, the amendments made are not opposed.

The Planning Balance

The proposals will cause harm to the character and appearance of the Hotwells and Clifton Conservation Area. A significant part of that harm is derived from the loss of the Zoo from the site, which it appears cannot be avoided as the site is no longer compatible with modern standards of animal welfare.

The introduction of vehicular traffic into the site will have marked adverse impact on its character and appearance. As we have noted previously, the traffic-free nature of the gardens contributes to their tranquillity and sense of “otherworldliness”. You will need to be satisfied that vehicle movements have been kept to the absolute minimum necessary to service the proposed accommodation.

The site is not allocated in the statutory local plan, and as such your authority will need to carefully consider both the principle of residential development and the quantum of new homes. If you consider both the principle and quantum acceptable, our view is that the harm has been mitigated as far as possible through good design.

This allows you to proceed to the “planning balance” of weighing the less than substantial harm to the character and appearance of the conservation area against any wider public benefit offered by the proposals, in accordance with NPPF paragraph 202.

There are a number of heritage benefits associated with the proposals which should be considered alongside any wider public benefits. These include the retention and restoration of all the listed structures within the site, and the provision of free public access to the retained garden areas. We continue to encourage your authority to secure this public access through legal agreement, should you be minded to recommend approval of these applications.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

As per our previous advice, we also recommend that details of a strategy to interpret and understand the history of the site should be subject to an appropriately worded planning condition, if approved.

**Recommendation**

No objection to the applications on heritage grounds.

Initial Comments: please see the Appendix/Supporting Documents to this report.

xvi. **Avon Gardens Trust** – objection

Final Comments:

The revised proposals include minor changes to Blocks E1 – E3 to deal with complaints about potential overlooking. These appear to comprise changes to the locations of windows and internal layouts, but no mention is made of any overall reduction in height of the Blocks. A revised landscape masterplan has been submitted but the only change we have noted relates to the landscape of the terrace to Block E3, which is increased in width by 1m to reduce overlooking from the garden to Pooles House. Additional pedestrian accesses are provided, shown on a Revised Site Access Strategy, at the north east corner of the site onto Northcote Road (which had already been submitted), and also now additional pedestrian accesses from College Road, Guthrie Road, and the southern end of Northcote Road. Perhaps you could advise if there are any further changes to the landscape masterplan, or the overall height and massing of the development, which we have not gleaned from the submitted drawings and information.

The Trust remains concerned at the impact of the proposed development on this Local Historic Park/Garden and on the character of this part of the Clifton and Hotwells Conservation Area.

The Trust is still strongly of the opinion that the proposed extent and scale of development, and the site layout, would result in the Zoo Gardens being enclosed by extensive and overbearing blocks of development. The essential character and quality of the Zoo Gardens would be lost, with resultant impact to the character of this part of the Clifton and Hotwells Conservation Area. Although the gardens would be open to the public, the massing of development and introduction of vehicles to the site would reduce the quality of visitor experience.

The Trust also remains concerned at the impact on trees, in particular TPO trees. The development would result in the loss of 80 trees and 31 groups or part groups of trees. The translocation of 17 trees and 11 part groups (41 total trees), and 2 hedges is proposed as part of the proposals, but the Trust is concerned as to whether such translocations would be successful. Whilst the Arboricultural Report includes a drainage plan overlay showing root protection areas, there will be a need for other below ground services and the location of these may result in further trees needing to be removed, and difficulty in accommodating new planting. The proximity of some trees to proposed buildings, and the need for working areas and construction compounds, may also result in difficulties during the construction period leading to the loss of further trees. Future residents of the development may also call for trees to be removed where they are considered to be too close to windows, and block views out, even where daylight and sun lighting requirements are met.

Summary: - The Trust maintains its objection to the proposed development as it considers that the proposed development would be in contravention of the Bristol Development Framework Core Strategy Policy BCS22. The proposed development would fail to 'safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance', namely the Local Historic Park / Garden of Bristol Zoo Gardens.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Second Comments:

The Trust maintains its objection to the proposed development as it considers that the proposed development would be in contravention of the Bristol Development Framework Core Strategy Policy BCS22. The proposed development would fail to 'safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance', namely the Local Historic Park / Garden of Bristol Zoo Gardens.

The Trust remains concerned at the impact of the proposed development on this Local Historic Park/Garden and on the character of this part of the Clifton and Hotwells Conservation Area. The Trust is still strongly of the opinion that the proposed extent and scale of development, and the site layout, would result in the Zoo Gardens being enclosed by extensive and overbearing blocks of development. The essential character and quality of the Zoo Gardens would be lost, with resultant impact to the character of this part of the Clifton and Hotwells Conservation Area. Although the gardens would be open to the public, the massing of development and introduction of vehicles to the site would reduce the quality of visitor experience.

The Trust also remains concerned at the impact on trees, in particular TPO trees. The development would result in the loss of 80 trees and 31 groups or part groups of trees. The translocation of 17 trees and 11 part groups (41 total trees), and 2 hedges is proposed as part of the proposals, but the Trust is concerned as to whether such translocations would be successful. Whilst the Arboricultural Report includes a drainage plan overlay showing root protection areas, there will be a need for other below ground services and the location of these may result in further trees needing to be removed, and difficulty in accommodating new planting. The proximity of some trees to proposed buildings, and the need for working areas and construction compounds, may also result in difficulties during the construction period leading to the loss of further trees. Future residents of the development may also call for trees to be removed where they are considered to be too close to windows, and block views out, even where daylight and sun lighting requirements are met.

Initial Comments: please see the Appendix/Supporting Documents to this report.

xvii. **The Twentieth Century Society (statutory consultee)** – no objection

The Society has no objections to the majority of the work proposed to the 20th-century buildings and enclosures on the site. We do not take issue with the proposed reuse of the Grade II Birds of Prey Aviary as a seating area, and we support plans to restore the Grade II Monkey Temple as a garden folly. We are pleased that the Terrace Theatre (2003) will be retained as a community facility. When we first reviewed the application, we were concerned about the proposed two-storey zinc tile-clad rooftop extension to the 1930s Clock Tower Building which we felt would have a detrimental impact on the building. The architects have now revised and improved the design and, as such, we do not wish to comment on this aspect of the scheme.

These comments are summarised, please see the Appendix/Supporting Documents to this report for full comments.

xviii. **The Victorian Society (statutory consultee)**– objection

Final Comments:

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Thank you for consulting the Victorian Society on amendments to the original proposals for the redevelopment of Bristol Zoological Gardens. However, having reviewed the latest documentation our objection remains.

In our previous objection we drew attention to the site's high significance as one of Europe's earliest zoological gardens, and one which continues in this use. Furthermore, we highlighted the important role it plays in contributing to the significance of the Clifton Conservation Area and the setting of nearby designated and non-designated heritage assets.

The proposals which would see the site adapted to a new use, with a quantum of development alien to the character of the site and the Conservation Area, would cause serious harm to significance as outlined in our previous consultation response.

The amendments which comprise of minor design changes do not address these concerns and the proposals remain substantially as first presented. Our serious concerns about the harm the scheme would cause to the significance of the site, Conservation Area and nearby designated and non-designated assets remain.

The NPPF is clear that it is desirable to '*sustain and enhance*' the significance of heritage assets (para 190a), and that '*great weight should be given to the asset's conservation*' (para 199). Furthermore, that '*Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.*' (para 206). The amended proposals do not ensure this, and the Victorian Society maintains its objection to the proposals.

Initial Comments:

Bristol Zoological Gardens is a site of high architectural and historical significance. The fifth zoo to open in Europe, it is one of only three remaining 1830s zoological gardens in the British Isles. Its rarity as an early example of this type of landscape, its surviving historic zoological buildings, and continued use for its original purpose make it extremely significant. Furthermore, its place within the Clifton Conservation Area and relationship to nearby listed buildings mean that the Gardens are very sensitive and significant alteration is likely to cause a degree of harm not just to the Gardens themselves, but to the Conservation Area and nearby heritage assets.

The Victorian Society understands Bristol Zoological Society's desire to vacate the Gardens and we acknowledge that the principle of some degree of residential development could be acceptable. Irrespective of any future redevelopment, however, the departure of the zoo from the site will seriously harm the historic significance of the Gardens. We are also concerned by aspects of the design of the proposals.

Bristol Zoological Gardens is characterised by its low density, small scale, historic (listed) buildings, situated within a mature landscape, contained within a perimeter wall. This means that although the Gardens retain a discreet character of their own, distinct from the surrounding Conservation Area, they nonetheless make a positive contribution as an oasis within the surrounding built environment. The zoo does not compete with the neighbouring buildings for prominence, and it succeeds in preserving an openness towards the Downs. Importantly, despite alteration since opening in 1836, the site remains legible as a historic 19th century Zoological Gardens within a wider 19th century locality, something, as noted above, which is exceptionally unusual and significant.



**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The proposed development would seriously harm the significance and character of the site and the Conservation Area. The density and height of the new buildings would represent a gross overdevelopment and erode the character and legibility of the historic landscape. The height of the buildings around the perimeter of the site mean that the gardens would be cut off completely from the surrounding Conservation Area, effectively turning them into gardens for the benefit of the new development, rather than the wider locality. The height of the buildings would also harm the Conservation Area and nearby listed buildings by introducing a scale, form and architectural idiom at odds with the Conservation Area. The new buildings would compete with the listed Clifton College and the nearby 19th century housing, diminishing their prominence. They would also destroy any impression of openness linking the site to the Downs. These effects would be heightened by the lack of significant gaps between the proposed buildings, especially those to the north west and north east. Any acceptable proposal would be of a lower scale and density, better preserving the Garden's character and positive contribution to the Conservation Area.

Ultimately, this gives rise to the concern that the proposed development is not informed by a full understanding of the history and character of the site. Surviving zoological gardens of the 1830s are very rare and it is important that proper study of the site is undertaken to identify which parts of the original design survive. Any proposals must be based on these findings and seek to enhance and sustain this significance, ensuring that the gardens remain a heritage asset which can be fully appreciated by the public.

The NPPF is clear that it is desirable to '*sustain and enhance*' the significance of heritage assets (para 190a), and that '*great weight should be given to the asset's conservation*' (para 199). Furthermore, that '*Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.*' (para 206). This proposal would not enhance or better reveal the significance of the site and nearby heritage assets. The Victorian Society **objects** to the proposal in its current form.

xix. **Historic Buildings and Places (previously known as the Ancient Monuments Society) (statutory consultee) – objection**

While the departure of the Zoo from this site will harm the overall historic and communal value of the Gardens, HB&P acknowledges that an element of residential development is acceptable to secure the future of the site. However, we do have concerns with some aspects of the application.

We welcome the proposals to retain the 'parkland' setting around the central lake as well as the removal of later unsympathetic accretions to the designated and local heritage assets, and their refurbishment as parkland follies and dwellings. We agree that the location of the new apartment buildings is best located to the perimeter of the site, as proposed, however, their height and scale is excessive and harmful to the setting of the listed Zoo buildings and to the character of the conservation area. The existing buildings to be demolished are small scale and of different heights with spaces between each building, whereas the proposed buildings present a solid built form extending along each frontage, with little permeability beyond the formal entrances. The design and massing of these new buildings, particularly those on Guthrie Street opposite the listed Clifton College buildings, don't appear to fit well within the streetscapes of the conservation area, and at up to 6

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

stories, are too tall for the area. While not a listed building, the Art Deco clock building contributes to the story and development of the zoo over time. The roof extension is clumsy and doesn't respect the elongated proportions of the building, harming its appearance. Retaining it in its existing form would be preferable, and would provide a needed gap between the taller new buildings to either side.

While we don't oppose a modern architectural design, the design of the perimeter buildings should be reconsidered to better reflect the modulation, scale and rhythm of the neighbouring development to ensure the new development will contribute to and enhance the historic interest and significance of the conservation area.

Paragraphs 195, 199, and 200 of the NPPF (2021) are relevant.

Chapter 16 of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990 establish the requirements to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. I would be grateful if we could be informed of the outcome when this becomes available.

xx. **Bristol Civic Society** - objection

The Society is not convinced by the plans to redevelop the site for housing given the public open space designation, suggesting the proposal is neither open space or a housing development.

The Society questions who will wish to visit the site when it is surrounded and dominated by private housing. There will be the challenge of maintaining such a significant area of open space, presumably paid for by service charges on future residents. There will be inevitable pressure to create a gated community at some point in the future.

The special character of the existing Gardens will be further eroded with vehicles accessing an area where no vehicles have previously been permitted, both passing through the open space and parking there on a permanent basis. The verdant nature of the area will inevitably be completely transformed.

The site is of such special environmental and historical importance they should be retained as a fully accessible public asset.

Nevertheless, if the development in something like its current housing plus open space form is accepted, we have the following comments:

In our response to the earlier consultation we welcomed the principles published to guide the future of the Bristol Zoo site. The Society has considered whether the proposals match the aspiration of these principles. In particular, the aim to create an inspiring and sustainable development that celebrates the sites natural and built heritage. We will create space for communities to thrive and the wider public to enjoy a legacy to make us and Bristol proud.

The retention of open space for future public access (even if used less than if it was completely open space), and the reuse of historic buildings, are positive proposals. The proposed Conservation Hub is welcome. However, in the Societys view the current proposals fall short of the stated aspirations in a number of ways. Aspects of the proposals also cut across adopted development plan policies, in particular DM17 in the Bristol Local Plan Site Allocations and Development Management Policies

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

which states, Development on part, or all, of an Important Open Space as designated on the Policies Map will not be permitted unless the development is ancillary to the open space use.

The Society has reservations over the heights of several of the proposed residential blocks and considers that further detailed assessment will be required. The Society also has reservations about the quality of the architecture, and notes that others have also expressed the view that this site deserves building design proposals which make a much more positive contribution to the appearance of the Conservation Area and to the setting of Listed Buildings. This particular issue remains a critical aspect when making an overall assessment of the case to change the main use of the site. The Society is disappointed by the lack of ambition with respect to the eco credentials of the project, particularly with such a high level of car provision in such an accessible location.

**Height of buildings:** The Society has significant reservations about the heights of several of the proposed residential blocks and considers that further detailed assessment will be required. These reservations concern the impact of the heights of the perimeter blocks on the wider conservation area and on the internal character of the gardens themselves. The latter concern also applies to the town houses arcing around the lake, albeit to a lesser extent. Further assessment is required with respect to the proposed residential blocks to the north and northeast. At 7 storeys the corner block may well have adverse impacts both on the general appearance of the Conservation Area and on the specific amenities of neighbouring properties. Whilst the heights on the northern edge reduce gradually from 6, 5 and 4 storeys there is a need to carefully assess their visual impact. The Society is not convinced that the planning application demonstrates the potential impact of the proposed buildings by means of verified views. It has proved difficult to identify which views are being demonstrated and to assess in detail the potential future impact, particularly on neighbouring residents.

**Clifton Conservation Hub:** The Society welcomes the proposal to repurpose the iconic entrance building to provide for a range of conservation related activities. This seems an appropriate future for this historic part of the site.

**Vehicle access, circulation, and parking:** The Society is disappointed by the lack of ambition with respect to future car ownership and parking. Surely this well-located site has the potential to become an exemplar for a car-free development. The developers own plan showing resident routes to key local facilities provides very real evidence that key local facilities are all within easy walking distance. The need to provide circulation routes and undercroft parking areas makes the development much more invasive in terms of its impacts on the gardens than would be necessary with a car-free scheme. Details are required to demonstrate how the proposed vehicle access off Northcote Road will actually operate in practice. The Guthrie Road access exists and is more straightforward in terms of future operation.

**Retention of public access:** As noted above, there is clearly a challenge in retaining public access to the open spaces when they will be bounded by private residential areas. The juxtaposition of private and public outside areas will need very careful design and planning to ensure satisfying experiences for all parties. There is lack of clarity about the future of the water body is it really to be utilised for wind surfing and boating or for more conservation related purposes? As the illustrations demonstrate, and notwithstanding the efforts made to avoid significant incursions into the gardens, the Society fears that much of the essential character of the gardens will be lost. This is because of the likely visual dominance of the apartment blocks and the resulting sense of overbearing the gardens. Currently the gardens offer oases of tranquillity and privacy from urban bustle, with a minimal sense of intrusion from the outside world. There is a very real risk these will be lost, in part because of the dominance of

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

the proposed buildings but also because of the manner in which the service roads dissect the site and will bring vehicular movement deep into the gardens.

It is absolutely fundamental that if the BZS truly want to deliver a legacy consistent with the principles it published, then it should commit to binding any future developer to the proposals

xxi. **Conservation Advisory Panel** – objection

Second Comments:

Overall

It is acknowledged that the re-use and re-development of a facility, which was originally developed for a specific use and evolved over many years, is challenging. However, that does not mean that the scheme as proposed is acceptable. There is significant concern with the proposed quantum and scale of development, the poor quality of the architecture, the site layout and the substantial harm that would be caused to the character and appearance of this part of the Clifton and Hotwells Conservation Area and the setting of the listed buildings. Not to mention the effective loss of an established, nationally recognised zoological facility and gardens.

Harm to overall historic interest and significance of site

The May 2022 Heritage Statement acknowledged the harm that is caused to the site and Conservation Area through the departure of the Zoo from its historic home, a point echoed by Historic England. The CAP disagrees that this harm is justified by the current proposal, and there is no evidence presented by the applicant that they have looked at alternative uses for the site, neither have BCC nor HE so far examined the business case that concludes that closure of the Zoo site and the change of use is necessary or inevitable. The significance and irreplaceability of the site as a whole is fundamental to this application. Bristol Zoo Gardens is the oldest one in the UK and the fifth oldest in the world. It has been open for 150 years. NPPF 189 states: 'These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'.

Loss of Communal Value

Defined as 'Value deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.' in English Heritage, Conservation Principles, 2008. At the public level, hundreds of thousands of people have visited the Zoo as children, as adults and with their own children for more than 150 years and the loss of this experience is not to be taken lightly. Additionally, the ashes of many people have been scattered within the herbaceous borders - to be lost under a roadway - while others have held weddings and celebrations in the Pavilion, which will be lost to flats. These memories and experiences - communal value – are engraved in the psyche of thousands and will be lost or unavailable under this scheme. The communal value of this site cannot be underestimated and once lost will be gone forever.

Harm to listed buildings

The original and particular use of many of the buildings is integral to their historic significance and is cited as a key reason in the listing designations of the four animal houses on the site, justifying their listing at Grade II and their national importance. Harm to an asset of this significance should clearly be only as a last resort. The D&A statement refers to 'Historically significant buildings retained and

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

sensitively converted to unique, environmentally sustainable homes'. But the CAP finds that such conversion would completely change the presentation and significance of these buildings, meaning the loss of: the Clifton Pavilion, Great Aviary/Parrot House, Giraffe House and the Museum/Activity Centre, all to apartments. It is not considered that the applicant has made the case for the level of harm proposed to the listed buildings within the site.

#### Justification of harm

It is recognised by the NPPF that new uses are sometimes needed for heritage assets to generate income for their long-term future. In order to do this, it may be necessary to cause some harm, but it is clear that in identifying the 'optimum viable use' for a heritage asset, the optimum viable use is one that causes the least harm to significance. The CAP argues that the proposed scheme would cause significant and irreversible harm and is not justified.

#### Alternatives

Other proposals for the site have been put forward either in broad outline or in detail and this suggests that other schemes are possible. Covid has provided a distraction so that disposal of the site is presented as a finished decision. But this is a nationally important site and time could usefully be taken to allow further time for ideas or to run a competition to determine its future. While the governance of the Zoo is that of a limited company, it is also a charity with long-standing public responsibility. While it is acknowledged that the Trustees have fiduciary duty, the Objects of the Charity itself are to promote the public understanding and the conservation of wildlife and the natural environment and the scientific study of plants and animals. This housing estate proposal does not deliver either of these, while an alternative, perhaps in association with a body such as the Eden Project or the RHS, would do so.

#### Public amenity

The proposed public access and maintenance of the gardens is to be funded by a levy on the residents. But there is insufficient evidence that this right will be granted in perpetuity as this access is permissive and could be modified or withdrawn. It is the prediction of many objectors to his scheme that the diverse, spontaneous visitors imagined in the D&A statement will not materialise; residents will object to funding a public amenity and in time it will become a private space. As presented, while pedestrian access is marginally improved, it is still tightly controlled and timed. The general perception and experience of the site will be as a gated community, not welcoming and few will cross town to go there.

#### Design

Even if there were no alternative to building densely on the site, the proposal is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over-intensive with a consequential poor relationship with the adjacent school and its listed buildings. The north building at six storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular the Bear Pit would be overly dominated by new development.

#### Landscape

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Bristol Zoo Gardens are a locally listed heritage asset designated as a Local Historic Park/Garden and an Important Open Space. The Avon Gardens Trust has voiced concerns around the loss of trees, the viability of translocating other trees and hedges and the general impact on green infrastructure from ground and environmental disturbance during the long phases of works and the eventual overshadowing from tall buildings.

**Cars and Parking**

The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought not least as it creates another visual and psychological barrier for free pedestrian access to the green spaces within the site. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site.

**Conclusion**

As set out within Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council has a legal duty to have special regard to the desirability of protecting listed buildings and their settings, and also to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. This means that decision makers must give 'considerable importance and weight' to heritage issues when assessing an application. This has not been done in this instance.

The NPPF requires great weight to be given to the conservation of heritage assets. If there is substantial harm to or total loss of significance of a designated heritage asset, then permission should be refused unless the public benefits outweigh this level of harm, or the applicant can demonstrate that there are no other viable uses.

It is considered that the proposal would neither sustain nor enhance the significance of relevant heritage assets including the Conservation Area and listed buildings within and without the site. It would provide insufficient substantial public benefit to outweigh the substantial harm caused by the impact of such a poor scheme on the relevant heritage assets. It is not considered that this scale of development can be justified in a heritage context and the loss of the site as a public amenity is unacceptable. Furthermore, the applicant has not demonstrated that there are no other viable uses for the site. Consequently, the application does not accord with the applicable legislation, relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported.

**xxii. Bristol Waste – no objection.**

As the applicant has included comments and calculations from the recent Bristol Waste Company response to 22/02737/F in their design and access statement and the numbers of proposed units is very similar Bristol Waste has no additional comments. We would welcome dialogue with the applicant as the scheme develops.

**xxiii. Wessex Water**

The proposed foul water connections are acceptable in principle. We note the on-site SuDs arrangements. The applicant is proposing an overflow connection from the lake to the existing public foul sewer in Northcote Road (Manhole ST57740002 ). Surface water connections to public foul sewers are not normally allowed and only considered where there are existing proven connections and no other method of disposal. If the surface water cannot be discharge to the surface water

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

sewer to the north of the site and a connection to the existing public foul sewer is pursued we will require confirmation:

1. Of the drainage areas served by the Lake and the split between residential areas and highway.
2. That the Lake will not contain any groundwater or overland flows
3. Of the existing proven surface water connections to the public foul sewers
4. Of the predicted overflow use, flows and volumes.

xxiv. **Crime Reduction Unit (Avon and Somerset Constabulary) –**

The comments noted the security measures included within the Design and Access Statement. The comments suggested that undercroft parking can be vulnerable, advises standards of security for external cycle storage and communal mailboxes. Further, it was advised that the management of the site outside of daylight hours should be secured as part of the management plan. Finally, the comments advised that the affordable housing will need to meet the Council's Affordable Housing Guidance, and advised that Secured by Design certification should be obtained wherever possible.

xxv. **Avon Fire and Rescue** - no objection subject to the Applicant committing to meeting the costs of the installation of nine fire hydrants to serve the proposed development. This should be secured by s106 Agreement.

xxvi. **National Highways** - no objection.

The proposal is likely to result in a net reduction in traffic generation over the existing BZG use. The TA has also undertaken an assessment of the cumulative traffic impact of the site including the consented residential development for 62 dwellings on the BZG West Car Park (21/01999/F). The cumulative impact of both developments is forecast to be lower than the existing BZG site, resulting in a reduction of 29 two-way trips in the AM peak hour and 82 trips in the PM peak hour.

On the basis the proposal is forecast to result in a net decrease to the traffic currently generated by the site, National Highways is satisfied the development is unlikely to result in an unacceptable impact on the safe operation of the strategic road network, as defined by NPPF.

xxvii. **Health and Safety Executive, Building Safety and Construction Division** – no comment. As the case is under 18 metres we will not be providing comments on this case.

xxviii. **Design West** – comments in response to original plans

### Main Discussion Points

The principle of the proposals remained but they have been developed further in technical detail since the last review and some amendments have been made.

The panel welcomed the clearer narrative 'Bringing people together' and 'Connect people and wildlife' but felt that the vision and actual design response have not been fully aligned yet. It needs to be absolutely clear how the site is to be managed and controlled and how residents are going to be

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

interacting with visitors to the park. Potential phasing, buildability and provision of sufficient working space should also be considered at this stage.

FUTURE READY – Zero carbon strategies are developed early on seizing opportunities to generate clean energy, reuse structures, support behaviour change and reduce whole life carbon

The panel recommended aligning the proposal's sustainability, carbon reduction and energy targets with BCC's ambition to achieve carbon neutrality by 2030 which includes that there should be no net carbon emissions from any new development. The panel felt that by not pursuing a third-party accreditation, the Bristol Zoological Society (BZS) does not have a mechanism in place that will guarantee a highly sustainable scheme. The panel noted the embodied carbon targets were not ambitious enough. Whilst the panel welcomed the overheating assessments for the new build, they highlighted the need for conversions to be assessed as well.

CONNECTED – Places grow and develop efficiently, bringing land use and movement together - making connected sociable places with good active travel and public transport accessibility

The perimeter blocks follow the boundary walls, and the idea of garden pavilions which sit in the landscape has been retained. There is a tension between creating a welcoming park for the whole community and a walled housing development, and the pedestrian experience needs to be considered further to ensure all access points and routes appear inviting. Greater permeability was encouraged, as well as further consideration of the out of hours access.

HEALTHY & BIODIVERSE – All scales of development contribute positively to nature recovery, bringing people into contact with trees and greenspaces and supporting health and well-being

It is important to give the community as much access as possible to enjoy the gardens. A clear separation between public and private is useful, possibly even with clearer boundaries as currently shown to define the boundaries and have less reliance on informal defensible space. Balconies as private amenity space work well, albeit planting was questioned on them. The significant biodiversity net gain was praised.

CHARACTERFUL – The character of different places in the West of England is understood and reflected. Distinctive high-quality places contribute culturally, socially and physically

Identity and placemaking - We encourage the project team again to challenge the extent of 'the wall' and break it up further as we are concerned about the impact it has on its context as a residential development. The walls certainly are part of the character of the site, but it will be more important what visitors see when they look beyond the wall and through the gates. Certain entrances, especially at the north-east corner still do not appear welcoming and dominated by barriers to the development. The view from College Road appears to be of a private lake house rather than an inviting vista to the community garden and the lake which needs to be addressed.

Visual impact and massing - the current perimeter block proposals still appear unfriendly and not sufficiently modulated so they reinforce the sense of a physical perimeter barrier, impacting on the surrounding scale of buildings in the conservation area. The panel was very concerned that the scheme might be watered down once a developer/contractor comes on board. The panel strongly recommended to include further detail in the planning application such as 1:20 sections of the façade build up, depth of reveals, details of brick etc. to make this part of the approved planning application pack.

INCLUSIVE – Communities are involved creatively in the development of proposals and their needs considered



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The panel is concerned the site will not appear welcoming. The panel was pleased to hear that a process will be put in place where a management board including representatives from BCC, BZS, residents, an arts consultant etc. will be involved in future decisions. The panel also heard that there will be a charge for residents to pay towards the upkeep of the park. We felt that there needs to be clarity on the level of influence that future residents can and will have in order to be able to retain the public access model for the future.

**RELEVANT POLICIES AND GUIDANCE**

- National Planning Policy Framework, 2021 - referred to hereafter as “**NPPF**”
- Planning Practice Guidance - referred to hereafter as “**PPG**”
- Bristol Core Strategy (Adopted June 2011) – referred to hereafter as “**CS**”, policies starting with “BCS” are from this plan
- Site Allocations and Development Management Policies (Adopted July 2014) – referred to hereafter as “**SADMP**”, policies starting with “DM” are from this plan
- SPD – Planning Obligations (Adopted September 2012)
- SPD – Urban Living (Adopted November 2018) – referred to as “**UL SPD**”
- SPD7 – Archaeology and Development (Adopted March 2006)
- PAN15 – Responding to Local Character – A Design Guide
- Affordable Housing Practice Note (July 2022)
- Climate Change and Sustainability Practice Note (July 2020)
- Broadband Connectivity Practice Note (March 2022)
- Planning a Healthier Bristol, Assessing the health impacts of development (February 2013)
- Waste and Recycling Storage and Collection Facilities (Adopted 2010, Updated March 2022)
- Space Standards Practice Note (March 2021)
- Travel Plan Guide for New Developments (February 2023)
- Off-Street Residential Parking in Conservation Areas Note, Bristol Local Plan Policy Advice Note 6
- Conservation Area 5, Clifton and Hotwells, Character Appraisal and Management Proposals – referred to as “**the Appraisal**”
- Local Plan Review Emerging Policy - Limited weight should be attributed to the Local Plan Review at this stage, given its relatively early stage of progression. The Council’s Local Plan Review includes policies and designations relating to Local Green Space and Reserved Open Space, predominantly in a document titled ‘Bristol Local Plan Review: New Protection for Open Space – consultation (March 2019). Appendix 2 of this document includes the designations, and the site is not included as either a Local or Reserved Green Space.

In determining this application, the Local Planning Authority has had regard to all relevant policies of the Bristol Local Plan and to relevant guidance.

**EQUALITY ASSESSMENT**

The Public Sector Equality Duty is a material planning consideration as the duty is engaged through the public body decision making process. Section 149 of the Equality Act 2010 provides that a public authority must in the exercise of its functions have due regard to:-

- a) eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Act

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- c) foster good relationships between persons who share a relevant characteristic and those who do not share it.

During the consideration of this application due regard has been given to the impact of this scheme in relation to the Public Sector Equality Duty in terms of its impact upon the groups with protected characteristics as set out in the Equality Act 2010. These characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The development would appropriately provide for those who are mobility impaired, for example due to age or disability. In conjunction with the Landscape Design Statement, the Design and Access Statement confirms that level access is proposed throughout the gardens. The Hard Landscape Plan also demonstrates that accessibility has been considered, with appropriate hard surfaces being proposed to allow access throughout the site. Further, the Management Plan indicates that all points of access will provide safe and equal access, with sufficient widths to allow access, to for example wheelchair users. As Key Issue G (Transport and Highway Safety) explains, the development incorporates appropriate parking for disabled residents and visitors. Specifically, the proposal includes three parking spaces available for disabled residents adjacent to Block S1, one within the undercroft parking area for Block N, and two near the Clifton Conservation Hub available for visitors. Visitor parking is also provided within the street, in a similar manner to how some of the Zoo's parking demand was met. Visitors would not be unduly deterred from parking outside of the site in the surrounding roads, as they are well-lit, and the development would increase surveillance of these spaces.

The Bear Pit is proposed to be restored to its original built form and incorporated into the landscape as a raised viewing platform. There is only access to the platform via steps, other means of access such as through a lift or a ramp would harm this Grade II listed building's significance, and hence there is justification for this element of the development not being accessible for those who cannot use steps. Specifically, the countervailing factor concerns the need to allocate great weight to the designated heritage asset's conservation. Key Issue D.ix (Urban Design and Residential Amenity for Future Occupiers) assesses the proposal's urban living qualities, including how it provides for those with impaired mobility, and concludes that proposal meets the relevant planning policy expectations for wheelchair accessible housing.

Some representations have suggested that the closure of the Zoo would prejudice those with impaired mobility, as alternative similar zoo uses, such as the Wild Place, are not accessible. Key Issue A.ii (Principle, Loss of Community Use) addresses this matter, including the extent to which this is a relevant material consideration. Nevertheless, Key Issue A.ii (Principle, Loss of Community Use) concludes that in reaching the decision that there is alternative provision of animal focussed visitor attractions within the region, due regard has been taken in relation to the Public Sector Equality Duty in terms of its impact upon the groups with protected characteristics, including those with impaired mobility.

Whilst the open spaces are proposed to only be publicly accessible during daylight hours, there is a need to consider external lighting for future visitors and residents. For example, it is important for the development's pedestrian routes to feel safe and be desirable even when for example it is dark, otherwise the proposal could discriminate against groups with protected characteristics. The submitted External Lighting Assessment does so, providing an illustrative light strategy for the whole site, which demonstrates that the main pedestrian routes within the site will be appropriately lit to ensure safety, security and wayfinding. A condition is also recommended to ensure the final external

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

lighting scheme is appropriate. In-keeping with this assessment, the Crime Reduction Unit has also advised that the crime prevention through environmental design and Secure by Design Principles have been applied to the whole development, including the layout of roads, footpaths, parking, lighting, communal areas, boundary treatments, the layout and orientation of dwellings. Further, the Crime Reduction Unit advises that the proposal's communal areas, playgrounds and seating areas have been designed to allow supervision from nearby dwellings with safe routes for users to come and go. The proposal is therefore not expected to detrimentally effects groups with protected characteristics, by nature of its public realm either being, or being perceived as unsafe.

The LPA has had due regard to the Public Sector Equality Duty contained in the Equality Act 2010 when making the assessment set out in this report. The approval of this application would not have any adverse impact upon any protected group, save for the development not including step-free access to the raised viewing platform within the Bear Pit, albeit the great weight given to the conservation of the Grade II listed building outweighs the failure of the development to allow access to the viewing platform for all. Therefore, the requirements of section 149 of the Equality Act 2010 have been fully considered.

**BACKGROUND**

It is necessary to understand why the Society closed the Zoo at the site and has moved its wildlife activities to the Wild Place. The Planning Statement explains that visitor numbers have reduced since the 1960s, placing a financial strain on the Charity where it has been making a loss in the years immediately preceding the COVID-19 Pandemic. This is reported to be primarily a result of the constrained scale of the site compared to other zoo attractions and the loss of car parking provisions that service the Zoo. Indeed, officers do not challenge the Statement's assertions that since the Zoo's inception, standards and expectations for the keeping of animals at zoos has changed, largely insofar as larger enclosures are now expected, which the Statement suggests cannot be facilitated at the site. Further, the Statement highlights that the parking available to visitors has decreased in recent years, and due to a High Court legal ruling, from 2024 visitors will not be able to park at the North Car Park and Ladies Mile. The Society is also in the process of disposing of the West Car Park, where planning permission for a residential development was recently permitted (ref. 21/01999/F). Members of the public have challenged the reasoning for why the Society has closed the Zoo, generally these comments suggest the Zoo was viable economically, from an animal welfare perspective, and as a visitor attraction. These representations allege the Zoo's closure was therefore a commercial choice to generate finances for the development of the Wild Place. In relation to the reduction in visitor numbers, representations suggest this was influenced by a growth in visitor numbers at the Wild Place, and the rate of decline in visitors was not precipitous, and that additional forms of income generation and changes to the visitor experience could have positively addressed the falling number of visitors. Comments have also suggested that visitor numbers have not been constrained by a lack of car parking, and greater parking could have been achieved through using the West Car Park more effectively, such as through the provision of a multi-storey car park. Representations also allege that the closure of the Zoo was planned prior to the effect of the COVID-19 Pandemic being known.

Officers understand the criticisms relating to the choice to close the Zoo and acknowledge that there may well have been other options than the closure of the Zoo. However, the reasons provided by the Society for closing the Zoo are compelling, namely the difficulties in the current facilities meeting animal welfare standards, which have significantly changed since the Zoo's inception; declining visitor numbers; and reductions to available visitor parking spaces. Officers therefore consider the Society's decision to close the Zoo was not unreasonable. As the Zoo has closed, the key planning question is what happens to the site in future and how are its social and environmental assets/values appropriately assured over the longer term.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Unless another zoo operator is minded to operate from the site, a form of re-use or redevelopment is inevitable and needed to avoid a vacant and underused site that will quickly depreciate in landscape value if left unmanaged. The site could be re-used without the need for development, and some representations have suggested time should be allowed for alternative uses to be considered. The application does not seek to reincorporate the zoological use, meaning the principal use will be lost. Whilst the site has not been marketed, either as a going concern or as a vacant site, its availability was advertised for a short period as part of the Asset of Community Value process (this is discussed later, within Key Issue A, ii 'Loss of Community Use') and there has been widespread publicity, both locally and nationally, of the Zoo's closure. Notwithstanding this, the Council is not aware of any interest being expressed by other zoo operators (and modern animal welfare requirements would apply to all operators). Nor have any other re-use proposals come forward. This suggests the re-use of the site is unlikely to occur in any ascertainable timescale, with risks of the site's landscape and heritage values deteriorating whilst it remains vacant, and hence it is necessary to consider the redevelopment of the site. The proposed residential-led redevelopment of the site is a response to the need to redevelop the site, the principle of which must be considered in this context.

The proposal's impact on the site's social and environmental values must be considered. Whilst the site was only ever accessible to the public through payment, many of Bristol's residents highly value the site, which is reinforced by the site's nomination to the Council's Assets of Community Value List and the significant reaction to the planning application from members of the public, as well as key stakeholders in the local area. The site's use as a zoological garden provided value to the community through providing recreation, leisure, and educational facilities. Further, the physical features of the site support the quality of life within and around Bristol through its townscape and landscape quality, historical significance, and visual amenity. The Zoo's wider economic benefits to Bristol as a tourist attraction are also recognised, albeit no development plan policies address this consideration. Finally, as is clear from the response to the planning application, much of the Zoo's heritage is in its communal value, as for many residents, the Zoo forms part of their lived experience of Bristol, occupying important memories. The majority of these values are material to the required planning assessment in relation to the loss of the use as zoological gardens and the proposed development, this report considers these values in relation to the relevant planning policies.

**KEY ISSUES****Key Issue A. Principle of Development**

The application does not seek to reincorporate the zoological use, meaning the principal use will be lost. The principle of the proposal must therefore be considered.

## i. Important Open Space

The site is designated as Important Open Space within the development plan. The key 'in principle' policies concern the site's designation as Important Open Space are policies BCS9 'Green Infrastructure' and DM17 'Development Involving Existing Green Infrastructure'. The site's designation as a Local Historic Park and Garden under policy BCS22 is better considered as part of Key Issue B but this also concerns 'in principle' issues.

Policy BCS9 aims to protect, provide, enhance and expand the green infrastructure assets which contribute to the quality of life within and around Bristol. Loss of individual green infrastructure assets (outside of a development plan document) is only acceptable where it is necessary, on balance, to achieve the policy aims of the CS. Policy BCS9 protects open spaces that are important for:

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

recreation, leisure, community use, townscape and landscape quality and visual amenity. The policy therefore protects this site in terms of its characteristics that provide recreation, leisure and community use; and its physical features that contribute positively to the townscape, landscape, or biodiversity. Policy DM17 further outlines how the Local Plan ‘protects’ Important Open Spaces, stating that *“Development on part, or all, of an Important Open Space as designated on the Policies Map will not be permitted unless the development is ancillary to the open space use”*.

Whilst policies BCS9 and DM17 are, in some respects, stricter in relation to the protection of open space than the national policy on open space in place at the time they were adopted (the 2002 PPG17 in the case of BCS9 and the 2012 version of the NPPF in the case of DM17), both policies were found sound by their respective examining Inspectors. It is not therefore considered that these policies should carry reduced weight even if they are not fully consistent with national policy now in the NPPF.

However, the NPPF is also a material consideration, and amongst other things, Section 8 of the NPPF concerns open space and recreation. Open Space is defined by the NPPF as “All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity”. Paragraph 99 of the NPPF states:

*“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use”*.

The proposal includes many aspects that are consistent with policies BCS9 and DM17, including the integrated gardens, substantial landscaping, play areas, a café, historic follies integrated within the landscape, the theatre, and perhaps most significantly, a securable mechanism to ensure public access to the site and its long-term management. However, the residential proposals are contrary to policies BCS9 and DM17, largely as they are not ancillary to the open space use. Decisions must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. It is therefore necessary to consider if there are material considerations that indicate the residential-led development of the site is acceptable, contrary to policies BCS9 and DM17.

Whilst the site is designated as Important Open Spaces, it is unusual in that it is not free to access by the public, unlike other important open spaces, such as playing fields, parks, cemeteries, woods, as well as vast open spaces like the Clifton and Durdham Downs to the north of the site. In this way the current lawful use of the site is not a typical land use designated as Important Open Space, largely as the Zoo represents a curated visitor attraction that has only been accessible to members of the public who pay a fee. The zoological use of the site has ceased in any active sense (even if in land use terms it has not been abandoned), meaning the use that contributed the most to its Important Open Space value by providing public access has gone, albeit the site’s physical features that contributed to townscape, landscape, and visual amenity in the area are still present. As outlined within the ‘Background’ section, the use has ceased, there is no evidence of any alternative uses coming

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

forward in any ascertainable timescale, so risking the site's deterioration if it is left vacant for an extended period, and it is necessary to consider the redevelopment of the site.

Accordingly, there is justification for a new use, as there is a need to secure a future use for the site that can provide the long-term management of the open spaces (including the historic buildings within the landscape). The proposed residential use represents such a use. When considering if there are any material considerations that outweigh the harm associated with being contrary to policies DM17 and BCS9, it is reasonable to attribute weight to this justification. It is also reasonable to consider the features of the development that contribute to the site's open space value credentials. Specifically, Members should consider how well the redevelopment of the site will incorporate open spaces with a role and value for recreation, leisure, community use, townscape, landscape and/or visual amenity. The positive and negative aspects of the development in relation to these open space values are set out below.

The principal benefit of the development is providing free public access to the site and a securable plan for the long-term management of the site's historic and valued landscape and buildings. This will allow access for members of the public to visit the site and enjoy the retained and proposed open spaces and other features of the proposal that will provide opportunity for recreation, leisure, and community use, as well enjoyment of the site's visual amenity. As such, the site would continue to provide a communal value, as members of the public would be able to visit the site, and elements of the development would provide open space. Elements of the site's historic landscape and layout will be retained, such as the Grand Terrace and East Lawn, as will other historically important built structures, meaning the development would deliver ongoing public engagement with these historic features, contributing positively to the site's open space values associated with landscape and visual amenity.

The free public access to the site will be complemented by the increased permeability the proposal would deliver. The site currently has a single public entrance, housed in the listed Entrance Lodge buildings in the northwest corner of the site. All other entrances are used for staff and maintenance access only. The proposal includes a series of new public entrances, introduced using both existing and new openings in the perimeter walls. Accesses will be provided on each side of the site, significantly increasing permeability and better integrating the site with its immediate surroundings, as well as providing routes through the open space. This element of the proposal contributes positively to the site's open space value, given the increased permeability to the site would increase opportunities for recreation, leisure and community use, as well as increasing interaction with the retained aspects of the site that provide townscape, landscape and visual amenity value. It is recommended that public access to the site at no financial charge is secured by s106 Agreement.

The Applicant has prepared a Management Plan to explain how the open space proposed will remain a high-quality space with public access in perpetuity. The Plan sets out the ongoing maintenance, upkeep and management of the publicly accessible open spaces will be primarily funded by an estate service charge payable by residents that live on site (excluding affordable housing residents) and by commercial tenants and will be controlled by a Management Board. The Plan provides a viable framework to ensure long-term public access, as well as management of the open space in the interests of ensuring recreation, leisure, community use, and the up-keep of the landscape. The Plan meets the expectations of policy DM16 (see Key Issue C 'Green Infrastructure and Landscape Design'). Members are advised that should planning permission be granted, public access would be secured for the lifetime of the development by a s106 Agreement, this would also secure an

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

appropriate management plan. Interest groups have questioned if a s106 Agreement is a strong enough mechanism to secure free public access to the Zoo, suggesting that future residents may wish to remove or change this obligation. In terms of what can be secured by a planning permission, a s106 agreement is the best tool to secure public access in perpetuity. The LPA (or the Secretary of State) would need to approve the removal or any changes to the obligation in future. Any removal or changes sought using the statutory procedures in s106A or s106B of the 1990 Act would have to show that the planning obligations no longer served a useful purpose or if changed would serve the useful purpose equally well. These are rigorous tests to protect planning obligations that still fulfil useful public purposes. It is hard to envisage circumstances when free public access to the site would not continue to serve a useful purpose during the lifetime of the development. Certainly, the Council is entitled to approach the matter on the basis that it would not allow the removal or limitation of the proposed free public access for as long as that was still of benefit to residents of Bristol. Other legal mechanisms outside of planning have been suggested by interest groups and members of the public, including classification under Countryside and Rights of Way Act or Commons Act or similar, but such controls are beyond what can be required as part of any planning permission decision.

An Outline Public Art and Culture Strategy has been submitted. This sets out at a high level the approach to delivering successful public art provision, including permanent and semi-permanent commissions, as well as a programme of cultural events and performances within the site. Generally, the plan provides a tangible vision for how the redevelopment of the site can continue to be culturally relevant to Bristol, which will contribute positively to the site's open space value, by providing recreation and leisure activities at the site, and engaging with the community. The plan would be secured by condition as part of any planning permission.

The development also integrates many elements that contribute to open space value. The existing pedestrian access to the Zoo via the Grade II listed Entrance Lodge building will be repurposed as the 'Clifton Conservation Hub', providing community floorspace and a café. The building contributes positively to the townscape and the proposal's repurposing of it provides a long-term viable use, that will also provide a space for the community to use, along with a café that will support the open space. The Grand Terrace represents one of the original elements of the zoological gardens' design and will be retained within the redevelopment as part of the public open space. The Grand Terrace connects the Clifton Conservation Hub with the Bear Pit. The Bear Pit is a listed structure that is proposed to be sensitively restored to its historic state, which will ensure its retention as a landscape and townscape feature, contributing to the site's Important Open Space value. The proposals seek to retain the East Lawn and its present-day qualities, including a wide central lawn, open sky views and its use as the key public gathering space. The existing Theatre building will be retained, and additional seating proposed on the East Lawn will complement the Theatre use, which will still be able to provide space for performances. The East Lawn and Theatre will therefore continue to provide opportunity for recreation, leisure and community use, as well retaining a positive impact on the site's landscape and townscape qualities.

A large Play Area is proposed to the south of the East Lawn, which aside from an equipped play zone, includes landscape features. The Play Area provides space for recreation and will contribute positively to the site's open space value, especially given the lack of dedicated children's play equipment in the immediate area. To the south and east of the Play Area is the re-shaped Lake, which retains a large body of water at the site, which will provide improved biodiversity, landscape, and townscape value. A lake-side boardwalk is proposed around the Play Area providing an interesting route for pedestrians. Immediately to the west of the Lake is the Lakeside Garden, which proposes a calm, family-friendly winter garden. To the north west of the Lakeside Garden is the West Lawn, which is positioned to the

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

south of the Grand Terrace, with the houses proposed immediately to the south east of the Lawn. The West Lawn is a wetland meadow and integrated SuDS framed by trees, that will contribute positively to the site's open space value by nature of it representing an attractive feature within the landscape. The southern side of the site is predominantly composed of residential uses that do not contribute to the site's Important Open Space values, with the key exceptions being the Monkey Temple, Bird Aviary, and associated landscaping. Like the Bear Pit, these listed structures (Monkey Temple and Bird Aviary) will be restored, better revealing their historic significance, and ensuring their long-term viability as part of the open space/landscape. The Bird Aviary will be a new seating area and the Monkey Temple will remain an historic folly amongst appropriate landscape planting.

Generally, the approach to the landscape proposals delivers open space and supports the retention of the site's historic verdant setting, including improved elements of landscaping. The Arboricultural Team supports the general approach to tree retention, removal, and replacement (see Key Issue C 'Green Infrastructure and Landscape Design'). Further, the Landscape Design Statements includes key principles for ensuring long term management of the landscape post-construction.

The layout minimises potential harm to the open space by proposing the majority of new built form to the edges of the site where there is greater existing built form, this has the benefit of avoiding building on open space within the site. However, the proposal does result in some areas of open space being built on. The submission includes plans and assessments which consider the quantity of open space provided by the development, but there is ambiguity in what is considered as 'open space', nevertheless the quantity of open space is discussed below.

The Area Comparison plans illustrates that the proportion of the site covered by buildings will decrease marginally by 1% (existing 22% and proposed 21%), as will the amount of the site covered by hardstanding (a decrease of 1.6%: existing 27.8% and proposed 26.2%). Whilst these comparisons are helpful in understanding built form and hardstanding, they do not acknowledge the proposed private gardens, which do not count as open space. The Open Space Assessment therefore provides a more accurate representation of proposed open space, which reports that the development would deliver approximately 46% of total site area as open space (21,600 sqm out of 4.66 ha), with the remaining 54% of the site being composed of the proposed homes and gardens, internal access roads, and the Clifton Conservation Hub (see pages vi and vii of the Open Space Assessment). These figures should however be considered in the context of the proposal's landscape-led approach, where the roads in the site are designed to be pedestrian-friendly routes. Further, the Clifton Conservation Hub would contribute positively to the site's open space value, given its uses, such as the café, would support the leisure and community use of the open space. Taking this into account, the amount of the site capable of providing open space is greater than the 46% reported within the Open Space Assessment.

The Open Space Assessment acknowledges that not all the proposed open space is functional public open space. It suggests that if the Lake and wetland, the play areas, and other areas with limited functional value are excluded the functional public open space is 14,400 sqm (31%) of the site. However, this assessment does not acknowledge that areas such as the Lake would contribute positively to the site's open space value through its landscape quality and visual amenity, and the play areas would contribute to the public value of the open space at the site through providing opportunities for recreation, leisure, and community use. The Area Comparison plans suggests the proposal will result in a minor reduction in the proportion of the site covered by waterbodies/wetland (approximately 1.7%: existing 6.4% and proposed 4.7%). This is largely due to the proposal's rationalisation of the waterbodies at the site, which represents an improvement to the landscape



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

quality of the site's open space. The Area Comparison plans indicates the proposal will deliver a slight increase in children's play areas (existing 3% and proposed 3.3%), and officers also realise the proposal represents an opportunity to improve the quality of play areas at the site, the final design of the play areas is recommended to be secured by condition.

The Area Comparison Plan of the extent of the existing site where visitors access is denied or restricted is a better indicator of the development's provision for useable and accessible open space, which suggests the proposal will deliver a greater proportion of areas accessible to the public (albeit that some areas are shared use access routes) than the site currently does (existing public space 51%, proposed 56%). Officers do however recognise that many of the areas where the Zoo restricted access were enclosures, some of which contributed positively to the site's recreation, leisure, and community value. It is therefore difficult to conclude that the proposal will result in an increased quantity of open space when compared to the existing site using this indicator, but the development will allow for increased public access to open space at the site, both in terms of permitting free public access to the site and allowing greater unrestricted public access to a larger proportion of the site.

The impact the residential development will have on the site's open spaces and the visitor's experience must be acknowledged, including that if fewer homes were proposed, there would be less of an impact on the open space and more opportunities to provide open space. For example, within the south eastern quarter of the site, the balance of development is skewed in the favour of homes, which would impact the experience of visitors, and some accesses could provide greater visual and physical link to the elements of the site that contribute positively to the site's open space values. Further, as Key Issue B concludes, the development will have a harmful impact on the site's townscape and visual amenity value. These factors weigh against the proposal in relation to its impact on the site's open space, but there is justification for the introduction of residential development to the site, and the proposed quantum (as is explained in full in Key issue B.v). The residential development will generate income from future residents to pay for the long-term management of the open spaces within the site, and in turn to ensure free public access. In this way, the proposed residential dwellings are necessary to finance the long-term management of the site's remaining landscape and significant buildings.

The development would deliver significant public benefits by delivering freely accessible open space that will enable the site to continue to be a destination where members of the public can visit for recreation and leisure, meet as a community, and enjoy the landscape and townscape value the site provides. This represents an enhancement to the quality of open space provided at the site and a significant benefit, which outweighs the elements of the proposal that do not contribute positively to the provision of open space. The key test in paragraph 99b of the NPPF is whether any loss of open space will be replaced by "equivalent or better provision" looking at both the "quantity and the quality" of the re-provision. Here, whilst it is questionable whether in overall terms the development will lead to an increase (or even a maintenance) in the amount of existing open space, it is considered that the end result will be better provision of open space at the site because there will be a range of different high quality open spaces, managed and maintained for the longer term, with secured free public access, and increased permeability, so resulting in a marked qualitative enhancement in the nature of open space provision. It is therefore concluded that the application accords with paragraph 99b of the NPPF.

In summary, it must be recognised that the current use of the site as a zoo has ceased, and hence a new use is now being proposed, which does provide a route to secure publicly accessible and well managed open space at the site in perpetuity. Officers acknowledge comments received from

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

interested parties suggesting there may well be other viable uses of this site, but it would be unreasonable and disproportionate to expect the Applicant to provide evidence of such alternative uses, including how these uses would impact the site in relation to its Important Open Space designation. Whilst the proposal will deliver a materially different open space offering compared to the existing Zoo, the development will nevertheless deliver high quality open spaces that will be activated through free public access, and the proposal complies with paragraph 99b of the NPPF. These cumulative benefits are material considerations that attract such a significant amount of positive weight, they outweigh the negative weight associated with policies BCS9 and DM17, meaning the residential-led development is acceptable in principle. It is recognised that this does represent a departure from the development plan, but there are material considerations that indicate these development plan policies should not be followed.

ii. Loss of a Community Use

The key 'in principle' policies concerning the proposal's impact on, and provision of community facilities are BCS12 'Community Facilities' and DM5 'Protection of Community Facilities'. The use of the site meets the definitions for community facilities included in the explanatory texts to policy BCS12 (4.12.2) and policy DM5 (2.5.2 and 2.5.3), as the Zoo provided a social and community role, predominantly through the provision of education facilities. As the Planning Statement acknowledges, the zoological use of the site was operated by the Society, a conservation and education charity, meaning it was not community led. The Statement also advises that the community generally would not have free access to the Zoo. In this way it is reasonable to consider that the Zoo was not a 'typical' community facility, like for example a use where the sole or primary function is to serve the community, and the Zoo did not serve the day-to-day needs of community. Officers acknowledge that the existing use does not fit neatly under the umbrella of uses safeguarded by policies BCS12 and DM5, such as a place of worship or community centre, but nevertheless advise that as the site represents a community facility, it is necessary to consider the proposal against policies BCS12 and DM5.

Policy BCS12 states: "...existing community facilities should be retained, unless it can be demonstrated that there is no longer a need to retain the use or where alternative provision is made". Policy DM5 provides further criteria to determine the importance of the facility, in terms of this application, the policy states that "*...the loss of the community facility should not be permitted unless it is demonstrated that:*

- i. The loss of the existing community use would not create, or add to, a shortfall in the provision or quality of such uses within the locality or, where the use has ceased, that there is no need or demand for any other suitable community facility that is willing or able to make use of the building(s) or land; or*
- ii. The building or land is no longer suitable to accommodate the current community use and cannot be retained or sensitively adapted to accommodate other community facilities; or*
- iii. The community facility can be fully retained, enhanced or reinstated as part of any redevelopment of the building or land; or*
- iv. Appropriate replacement community facilities are provided in a suitable alternative location".*

The explanatory text to policy DM5 (paragraph 2.5.3) advises that the importance of community facilities should be considered, and paragraph 2.5.4 advises that "*when making an assessment of the importance of the community facility consideration should be given to:*

- Local need and demand for the existing community facility or other community facilities that are willing and able to make use of the building(s) or land;*

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- *The extent and quality of local provision of the existing community facility;*
- *The nature, pattern and frequency of activities taking place at the site;*
- *Its contribution to the diversity of community facilities in the locality;*
- *The accessibility of the site and other local community facilities by walking, cycling and public transport;*
- *In the case of commercial community facilities, whether the use is no longer viable (applicants will need to submit evidence to demonstrate that the site is no longer viable for that use and has been adequately marketed. The latter should be undertaken in accordance with the guidelines on the carrying out of marketing which are available to view on the council's website under planning advice and guidance.);*
- *Whether the site or building has been listed as an asset of community value”.*

As a number of the bullet points above are relevant to the consideration of policy DM5's criteria, it is helpful to understand the application in terms of these considerations.

The Planning Statement advises that the majority of visitors come from Bristol and the wider South West, with 60% of visitors coming from outside of Bristol according to the 'Response to Case Officer's Note' received in January 2023. This indicates that whilst local residents would visit the Zoo, it was a regional attraction, rather than providing for need and demand for the local community. The Planning Statement also outlines that alternative provision for the existing use is provided within the region. Officers agree with this statement and find the regional-level to represent a suitable catchment to consider whether there is alternative provision for the Zoo. There is alternative provision of animal focussed visitor attractions within the region, for example the Wild Place Project where the Zoo is relocating, and Noah's Ark Zoo Farm. Comments have suggested that the Wild Place is not a suitable alternative for reasons of location, equality and access. The location of the Wild Place at Blackhorse Hill near Cribb's Causeway is also within the South West region, and from visiting their website, it does appear from their Accessibility Statement that whilst some areas will not be accessible to all, for example wheelchair users, the Wild Place does have procedures in place to ensure equality of access. From Bristol, the Wild Place is not as easily accessed by sustainable modes of transport as the Zoo is, however the Wild Place's website indicates that it is possible to travel by bus from Bristol to stops only a short walk to the Wild Place. Similarly, Noah's Ark Zoo Farm is also accessible from Bristol by bus, and their website explains that most areas are wheelchair accessible, their Accessibility Guide also explains how the venue caters for those with hearing and visual related disabilities. Accordingly, in reaching the decision that there is alternative provision of animal focussed visitor attractions within the region, officers have had taken due regard in relation to the Public Sector Equality Duty in terms of its impact upon the groups with protected characteristics, including those with impaired mobility.

The use performs other community roles, including the site's value as a place for the community to spend time within the gardens and a venue to host events. The proposal includes free public access to the site and provides open spaces that would be valuable to the local community. Further, the proposed Conservation Hub includes an exhibition space, an education room, a small office attached to the education space, a meeting room, and a café that could also host meetings or other events, the relevant details will be secured by condition. The submitted Public Art and Culture Strategy sets out the approach to delivering successful public art provision, including permanent and semi-permanent commissions, as well as a programme of cultural events and performances within the site. As a result of these features, the proposal ensures that the site will still provide for the local community, and in part will be enhanced due to the proposed free public access.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The site is not within the most accessible part of Bristol for walking, cycling and public transport, which is reflected in the applicant's 'Response to Case Officer's Note', where it is reported that 85% of the Zoo visitors arrived by car (this data is from the 2021 High Court Case). However, it is accepted that the site is accessible by public transport given it is on a main bus route and is within less than 1km walk to Clifton Village and Whiteladies Road.

Whilst operated by a charity, the use of the site was commercial in nature. The Planning Statement suggests the existing use cannot be retained due to viability reasons relating to falling visitor numbers, a lack of car parking, and expectations for animal welfare. The Zoo has closed, this may well have been a result of a commercial decision as many stakeholders have suggested, but as per the 'Background' section, the reasons for closing the Zoo provided by the Applicant indicates that this decision was not unreasonable, and there is a need to reuse or redevelop the site.

The site is listed as an Asset of Community Value, which suggests the site provides an important community facility. The Society has served notice of the intent to dispose of the site, to which no responses were received from community groups seeking to register an interest to purchase the site. In accordance with the relevant legislation, this means the Society is free to sell the site. This evidences that within the 6 weeks' notice period, no eligible community groups registered an interest to buy the site, which does suggest a lack of interest from community groups to reuse the site for community purposes but falls short of evidencing that there is no need or demand for any other suitable community facility that is willing or able to make use of the site, given the short notice period.

Concerning policy BCS12, the application includes sufficient information to demonstrate that there is already alternative provision for the zoological use of the site within the region and the other community attributes of the use are being re-provided as part of the proposals, meaning the loss of the community use is not resisted in relation to policy BCS12. In relation to policy DM5, only one of the five criteria listed needs to be met to enable the loss of community facilities land or buildings.

Criterion i of DM5 has two limbs, depending on whether the community use is still ongoing or has ceased. This is a case under the second limb. In relation to the second limb of criterion i, whilst evidence has been provided to suggest that within a short notice period associated with the Asset of Community Value, no interest from community groups to make use of the facility was received, this falls short of the expected marketed period to meet the threshold of the second limb of criterion i. In response to criterion ii, the Applicant's case is the site is no longer suitable to accommodate the current use. Limited evidence has been provided to suggest another community facility could not operate from the site, meaning criterion ii of policy DM5 is not met. However, officers do acknowledge that the nature of the site may not lend itself to many other community uses. Criterion iii is not satisfied because, whilst some aspects of the community use are being re-provided, it is not being fully retained enhanced or reinstated because the principal zoo use will not be included. With regard to criterion iv, there is a need to consider whether there is appropriate replacement provision of the community facilities. As already noted, the zoo use has been re-provided for at the Wild Place Project but there are other community aspects to that use. Those more local aspects, as an open space, events venue, and meeting place for the community, are being re-provided at the site in an enhanced form. Similarly, the Planning Statement provides evidence of alternative zoological uses in the wider region, which is considered to represent a suitable alternative location for that element, meaning that taken overall the proposal meets policy DM5, criterion iv.

It also necessary to consider Section 8 of the NPPF, paragraph 93 is most relevant and states:

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

*“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;*
- d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and*
- e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services”.*

The development meets the expectations of paragraph 93 a and b, by integrating proposals that will provide for the community, including the provision of open spaces, a play area, and community-focussed floorspace. As has been established, the site provides valued facilities and services, but it is fair to conclude that the loss of the zoological use would not reduce the community’s ability to meet its day-to-day needs, meaning the proposal meets the expectations of paragraph 93 c. For example, where members of the public have suggested they visit the site regularly, they explain this is to allow children to play in a safe environment, the proposal would still provide for this community use. The established zoological facilities will be lost at the site, but as discussed, the proposal retains and provides community facilities, such as open spaces and dedicated floorspace within the Clifton Conservation Hub, that will support the local community, in accordance with paragraph 93 d and e.

Overall, officers recommend that the proposal meets the expectations of policies BCS12 and DM5, and paragraph 93 of the NPPF. Many comments received made by interest groups and members of the public strongly object to the loss of the zoo as a community facility, suggesting the site represents a viable zoo or that an alternative community-focussed use could operate from the site. Further, comments have also argued that other zoological uses in the region should not represent ‘alternative replacement community facilities’, on the grounds of location and the nature of the uses. Officers disagree with this argument, but for the avoidance of doubt, even if the proposal failed the expectations of policies BCS12 and DM5 as some suggest, officers would still recommend that the loss of the existing community facility should not represent a reason to refuse the development. The proposal’s overall offer to the community would continue to provide the social, recreational and cultural facilities and services the community needs, in a different but comparable manner to the existing value of the Zoo’s facilities, predominantly due to the free public access proposed.

### iii. Community Floorspace (Class E, F1 and F2)

The existing Grade II listed Entrance Lodge building will be converted into a mixed-use building known as the Clifton Conservation Hub building, which includes a café, exhibition area, education and meeting room, and WCs (Classes E, F1 and F2). The submission suggests this building will be community-focussed, and this is needed to help activate the publicly accessible gardens and retain community floorspace at the site. For example, the café use would support functioning of the public open space through providing visitors with a place to buy food and drink, shelter from inclement weather, and use WCs. The café use, whilst not strictly a typical community floorspace as per the definitions included in policies BCS12 and DM5, will nevertheless provide space for the community to meet, and will complement the open space. In accordance with policy BCS12, the community floorspace is in a location with a range of travel options and it is suitably accessible to all members of the community.

The Use Classes proposed include:

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- E(a) Display or retail sale of goods, other than hot food
- E(b) Sale of food and drink for consumption (mostly) on the premises
- E(c) Provision of:
  - E(c)(i) Financial services,
  - E(c)(ii) Professional services (other than health or medical services), or
  - E(c)(iii) Other appropriate services in a commercial, business or service locality
- E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink,)
- E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- E(f) Creche, day nursery or day centre (not including a residential use)
- E(g) Uses which can be carried out in a residential area without detriment to its amenity:
  - E(g)(i) Offices to carry out any operational or administrative functions,
  - E(g)(ii) Research and development of products or processes
  - E(g)(iii) Industrial processes
- F1 Learning and non-residential institutions – Use (not including residential use) defined in 7 parts:
  - F1(a) Provision of education
  - F1(b) Display of works of art (otherwise than for sale or hire)
  - F1(c) Museums
  - F1(d) Public libraries or public reading rooms
  - F1(e) Public halls or exhibition halls
  - F1(f) Public worship or religious instruction (or in connection with such use)
  - F1(g) Law courts
- F2 Local community – Use as defined in 4 parts:
  - F2(a) Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres
  - F2(b) Halls or meeting places for the principal use of the local community
  - F2(c) Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms)
  - F2(d) Indoor or outdoor swimming pools or skating rinks

Of these uses, the following are considered main town centre uses (as defined by policy DM7 and the NPPF's Glossary): Class E(a),(b),(c),(d), and (g); Class F1(b), (c), and (e) exhibition halls only; and Class F2 (a) and (d). The development plan primarily directs main town centre uses to centres, as policies BCS7 and DM7 generally do not support such uses outside of designated centres. Policy DM7 however, permits main town centre uses outside of centres in limited circumstances, one being where "The proposal is of a small scale and aimed at providing for local needs" (policy DM7 ii). Paragraph 2.7.7 of policy DM7 identifies 'small-scale' as having a floorspace no greater than 200 sq.m. The floorspace of the Clifton Conservation Hub exceeds 200 sq.m, and given the mix of uses proposed, if permitted without restriction, the total main town centre uses could exceed 200 sq.m, meaning a sequential test is required to address the first criterion of policy DM7 i. However, the Applicant contends that the extent of main town centre uses proposed could be limited by condition, to ensure that the total floorspace used by main town centre uses do not exceed 200sq.m, and hence a sequential test is not required.

Specifically, the Applicant advises that they are willing to accept a condition that restricts the use of the building so the only main town centre uses permitted would be classes E(a) 'Display or retail sale of goods, other than hot food' and E(b) 'Sale of food and drink for consumption (mostly) on the premises', and Class F1(e) 'Public halls or exhibition halls'. The Applicant has submitted a plan (ref. BZG-PPA-CCH-ZZ-SK-A-1101 PL1) showing the extent of floorspace within building that they suggest would be used for the main town centre uses, this helps to demonstrate how the building would

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

operate with a restrictive condition imposed. By visually demonstrating the extent of the total main town centre floorspace (200 sq.m) within the building, the plan can also be subject to a restrictive condition, which would aid potential enforcement of the condition should more than 200 sq.m be used by main town centre uses. Such a condition would not unduly compromise the viability of the building, which must be ensured given its listed status. This is because the floor area leftover after the main town centre uses (the café and exhibition space) is not contrived by nature of the building's shape or remaining floorspace. Rather, the extent indicated on the plan for the main town centre use leaves required circulation space, the WCs, and a more contained series of connected rooms, primarily centred around the 'education room' as labelled on plan. These rooms could be used for permitted non-main town centre uses, including for the provision of education and as a meeting space for the community. A restrictive condition would not prevent the flexible use of the building as envisaged in the submission, for example the area labelled as a café on plan could still provide a meeting place for the local community.

Officers are therefore confident that a condition can successfully restrict the main town centre uses so the proposal of such uses can be considered 'small scale', as required by policy DM7, criterion ii. To be acceptable out of centre, criterion ii also requires the main town centre proposals to be aimed at providing for local needs. The Applicant has explained how the proposed café floorspace (classes E(a) and (b)) and exhibition space (class F1(e)) would provide for a local need. Amongst other things, Classes E(a) and (b) allows for the sale of food and drinks to either be consumed on the premises, or be taken away. As such, the Applicant suggests that the café use will support and encourage the public use of the open spaces proposed at the site, as well through providing a meeting space for the local community. Officers agree that the uses permitted by Class E(a) and (b) would support the open space at the site, through providing members of the public with a place to purchase food and drink to compliment the experience of visiting the site, as well as by providing a place for rest or to shelter when visiting the development. Class F1(e) provides a space use as a public hall or exhibition hall, the submission suggests the room labelled on plan as 'exhibition space' will likely mainly operate in an ancillary manner to the community uses of the building, such as the education use. Further, the Community and Public Benefits document (Jan 2023) authored by the Society, suggests the building could provide exhibition space showcasing the site's heritage, as well as the Society's ongoing conservation work. Justification has therefore been provided to demonstrate how these uses are aimed at local needs. The restrictive condition will need to also limit the allowed main town centre uses to only Classes E(a) and (b), and F1(e).

In summary, subject to a condition to restrict main town centre uses, the proposed main town centre uses are acceptable in this location, as they comply with policy DM7's requirement for them to be of a small scale and aimed at providing for local needs. A sequential test is not required by the NPPF, as in accordance with paragraph 87, the planning application is in accordance with the development plan. The restrictive condition is advised, and will have the following key restrictions:

- In accordance with plan ref. ref. BZG-PPA-CCH-ZZ-SK-A-1101 PL1 the extent of floorspace occupied by main town centre uses within the Clifton Conservation Hub building shall be limited to no more than 200 sq.m, and shall only be used for the following purposes as defined by Classes E(a) and (b), and F1(e).
- Main town centre uses are those defined by the Policy DM7 (para 2.7.6) and the Glossary to the NPPF.

Conditions are recommended to ensure the building fulfils the intent of the submission as a primarily community-focused mix of uses, this includes restricting how the building could be used in future, and to ensure the WCs are publicly accessible when the building is open.

The proposed café represents a food and drink use, meaning policy DM10 applies. The proposed café use will not harm the character of the area, residential amenity and/or public safety, either

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

through its individual or cumulative impact. A condition is recommended with regard to its management, to ensure it will not materially harm the amenity of the area. The proposal is not a takeaway, hence in relation to nearby students (e.g. Clifton College), the café is unlikely to influence the behaviour harmful to health or the promotion of healthy lifestyles. The café could operate ancillary takeaways to the café use, but given the likely scale this operation would represent, it is unlikely that it would influence behaviour harmful to health or the promotion of healthy lifestyles.

The principle of the proposed uses within the Clifton Conservation Hub are considered to be acceptable and represents a public benefit to the local community.

## iv. Residential Development

Subsection i and ii of this Key Issue established that policies relating to the protection of open space and community facilities are not a reason to resist the residential-led redevelopment of this site. Therefore, it is necessary to consider policies concerning housing delivery.

Policy BCS5 'Housing Provision' sets out the CS's aim '...to deliver new homes within the built up area to contribute towards accommodating a growing number of people and households in the city', and highlights that the '...minimum target will be 26,400 homes between 2006 and 2026'. Further, policy BCS5 identifies that the '...development of new homes will primarily be on previously developed sites across the city', and goes on to advise that 'some new homes will be developed on open space which does not need to be retained as part of the city's green infrastructure provision'. The development would contribute to the minimum new homes target discussed in policy BCS5 and would provide housing in a built-up area, as envisaged by the policy. The site includes many permanent built structures but cannot be considered as previously developed land due to the definition provided by Annex 2 of the NPPF. Whilst the policy expects new homes to primarily be delivered on previously developed sites, it does not preclude the provision of housing on open spaces. Specifically, policy BCS5 allows new homes on open spaces which do not need to be retained as part of the city's green infrastructure provision. The site does not form part of Bristol's Strategic Green Infrastructure, as illustrated by Diagram 4.9.1 of the CS. As Subsection i of this Key Issue 'Important Open Space' explains, the site does not need to be retained in its current form to provide valuable open space as part of the city's green infrastructure provision. Therefore, the residential-led redevelopment of the site complies with policy BCS5.

Policy BCS20 'Effective and Efficient Use of Land' seeks to ensure that all developments maximise the use of previously developed land, but importantly does not prevent the development of undeveloped land. Applicable to this site is the key expectation of the policy, that development uses land efficiently, achieving densities appropriate for the respective site. The policy expects appropriate densities for sites to be informed by the characteristics of the site, the local context, the site's accessibility, the opportunities for a mix of uses across the site, the need to provide an appropriate mix of housing to meet the community's needs and demands, and the need to achieve high quality, well designed environments.

In common with policy BCS5 and BCS20, the NPPF promotes the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (paragraph 119). Further, paragraph 120d of the NPPF expects planning decisions to amongst other things, 'promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively...'. The site is under-utilised given the Zoo has closed, and the residential-led development will help to meet the identified need for housing in Bristol. The Council cannot demonstrate a five year supply of deliverable housing sites (the Council identified a housing land supply of 2.45 years for the purposes of a recent Appeal at Brislington Meadows) and has failed its most recent Housing Delivery Test. These indicators highlight the



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

significant need for new housing developments in Bristol, a need which this application would help to address. The principle of the residential-led redevelopment of the site is considered to be acceptable.

As the Council cannot demonstrate a five year supply of deliverable housing sites and has failed the recent Housing Delivery Test, paragraph 11(d) of the NPPF is engaged. In accordance with paragraph 11d.i, if the proposal is found to be contrary to policies in the NPPF concerning designated heritage assets or habitat sites (as listed in paragraph 181), this would represent a clear reason for refusing the development. Those issues are addressed in Key Issues B 'Heritage Assessment' and I 'Nature Conservation' of this report and the conclusion is reached that, subject to appropriate conditions and the securing of benefits in a s.106 agreement, they would not justify a refusal of permission. In these circumstances, the presumption in favour of sustainable development as set out in paragraph 11(d) of the NPPF is engaged. This indicates that the planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole (11d.ii). Together with this Key Issue, the remaining report assesses the development against the development plan, along with other material considerations, including the NPPF, culminating in a consideration of the planning balance, where any adverse impacts of the granting planning permission are weighed against its benefits, when assessed against the policies in the NPPF when taken as a whole (see Key Issue L 'Planning Balance and Conclusion').

v. Summary

Officers acknowledge the harm associated with the residential use of land designated as Important Open Space, but for the reasons discussed in subsection i, advise that there are material considerations that indicate the residential use is acceptable. Largely as the development will enhance the site's open space value, through providing high quality open spaces that will be freely accessible to members of the public. The residential use is necessary to fund the long-term management of these spaces at no cost to members of the public. The proposal meets the expectations of policies BCS12 and DM5, and paragraph 93 of the NPPF. The proposal's overall offer to the community would continue to provide social, recreational and cultural facilities and services to the community, in an equitable manner to the existing value of the Zoo. The principle of the development is therefore acceptable with regard to its impact on the existing community facilities at the site. The proposal's significant housing offer attracts substantial weight, especially given the Council's housing supply issues. Overall, the principle of the development is acceptable.

### **Key Issue B. Heritage Assessment**

This section considers the proposal's impact on heritage assets, through initially setting out the relevant policy and guidance, and then assessing the development's impact on heritage assets in accordance with discussed policy and guidance. The assessment also considers the cumulative impact of the proposal and the approved residential development of the West Car Park.

i. Relevant Policy and Guidance

As advised by Historic England's comments, any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the NPPF and the Local Plan.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

setting, the local planning authority 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. The Authority is also required (under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990) to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. Where there is harm to a listed building or a conservation area the decision maker must give that harm considerable importance and weight.

Section 16 of the NPPF sets out the expectations for the role planning decisions should play in conserving and enhancing the historic environment. A 'heritage asset' is defined in the NPPF (Annex 2) as: *"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."* 'Significance' is defined (also in Annex 2) as *"the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."*

Paragraph 189 of the NPPF states: *"Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value [FN66]. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations [FN67]"*. The thrust of this paragraph is embodied within the further paragraph of the NPPF that advise on how to assess proposals impact on heritage assets.

When considering the current proposals, in line with paragraph 194 of the NPPF, the significance of the asset's setting requires consideration.

Paragraph 195 states: *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."*

Paragraph 199 states that in considering the impact of proposed development on significance great weight should be given to the asset's conservation and that the more important the asset the greater the weight should be.

Paragraph 200 states: *"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

- i. grade II listed buildings, or grade II registered parks or gardens, should be exceptional.*
- ii. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Therefore, clear and convincing justification is needed if there is loss of or harm to the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting).

Paragraph 201 provides advice where there would be substantial harm to a heritage asset and, essentially, requires it to be necessary to cause that harm to deliver substantial public benefits outweighing the harm or the nature of the heritage asset makes this the only practical option. As explained below, it is not considered that this is a 'substantial harm' case.

Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. As explained below, it is considered that this is a 'less than substantial harm' case.

Paragraph 203 advises where a proposal will impact the significance of a non-designated heritage asset, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Paragraph 206 states that local planning authorities should look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting, that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Paragraph 207 states: *“Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole”.*

In addition, policy BCS22 states that: *“Development will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including historic buildings both nationally and locally listed... and conservation areas.”* Policy DM31 requires that *“proposals affecting locally important heritage assets should ensure they are conserved having regard to their significance and the degree of harm or loss of significance”.* In relation to conserving heritage assets, the policy goes on to state that:

*“Where a proposal would affect the significance of a heritage asset, including a locally listed heritage asset, or its wider historic setting, the applicant will be expected to:*

- *Demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and*
- *Demonstrate that the works proposed are the minimum required to secure the long term use of the asset; and*
- *Demonstrate how those features of a heritage asset that contribute to its historical, archaeological, social, artistic or architectural interest will be retained; and*
- *Demonstrate how the local character of the area will be respected.”*

Further to these heritage-related policies, policy DM26 is also highly relevant as it helps to express the aims of policy BCS22 in a series of key urban design objectives for new development. There are

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

also a range of more urban design-related policies relevant to this development that all seek to achieve a high standard of urban design – Policies BCS20, BCS21, DM27, DM28, DM29, and DM30. In addition to these policies, is the UL SPD that includes relevant urban design-related guidance. Whilst the assessment of the proposal's impact on heritage assets is a key element of urban design, officers consider it necessary to focus only on the proposal's impact on heritage assets within this Key Issue, remaining urban design considerations will be assessed in the Key Issue D. Finally, the Council has published a Character Appraisal and Management Proposals for the Clifton and Hotwells Conservation Area (dated June 2010), this document is referred to hereafter as 'the Character Appraisal'.

## ii. The Heritage Assets

The application has the potential to impact the following heritage assets:

- Clifton and Hotwells Conservation Area (within)
- The Downs Conservation Area (immediately to the north)
- Listed buildings:
  - Bristol Zoological Gardens entrance (Grade II), north west corner of site
  - Giraffe House (Grade II), south eastern side
  - South entrance gates and flanking walls, Gurthrie Road
  - Bear Pit (Grade II), within the site
  - Monkey Temple (Grade II), within the site
  - Eagle Aviary (Grade II), within the site
  - Clifton College, various Grade II and Grade II\* listed buildings on the southern side of Guthrie Road, including Warden's Office, North East Wing, Percival Buildings and Wilson Tower, Big School building, and School House.
- Locally listings:
  - The site, as a historic park and garden;
  - The Clifton Pavilion (west side of site, facing College Road)
  - Clifton Music School (southern tip at junction of College Road and Guthrie Road)
  - Clifton College Preparatory School (north east)
  - Houses on Clifton Down (to the west)

Bristol Zoo Gardens is the earliest provincial Zoo in England, having opened in 1836. The site is designated as a locally listed historic park and garden, which is a non-designated heritage asset. As Historic England identifies, the gardens have been continually upgraded and adapted since opening but retain key features of the original design principles in a legible manner, including: a long terrace walk at the north side of the site, a large water feature in the centre, verdant planting, and landscaping, and exhibits in contained areas around the site perimeter. The site is of considerable heritage significance and contributes positively to the significance of the Clifton and Hotwells Conservation Area.

The site is located within centre of the very northern section of the Clifton and Hotwells Conservation Area. The Character Appraisal identifies the site as being within Character Area 2, titled 'The Zoo and College'. This area is considered to be distinct from much of the Conservation Area, given it is dominated by institutions, namely the Zoo and Clifton College. The Character Appraisal notes the Zoo and Clifton College are at the heart of the more formal grid pattern the streets follow in the north of the Conservation Area. Map 3 of the Character Appraisal identifies Northcote Road as an 'intimate route', as well as the route abutting the northern site boundary, whereas Guthrie Road and College Road are

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

considered to be 'secondary routes'. Map 4 of the Character Appraisal identifies the important views in the Conservation Area, of most relevance to this development are views P21, L25, LC21, and LC26. The Character Appraisal also identifies the site as a crucial landmark, containing landmark buildings, and Map 5 identifies a number of perimeter buildings on the north, east and south side of the site as 'neutral buildings', as well as buildings of merit and character buildings, including the Clifton Pavilion (locally listed) on College Road and Clifton College's Music School (locally listed) on the northern side of Guthrie Road. There are also character buildings on Northcote Road and College Road that contribute positively to the significance of the Conservation Area. Since the Character Appraisal was published, a number of buildings within the site have been listed by Historic England, these are listed above. Generally, the site includes listed and unlisted structures that contribute positively to the site's significance.

The Character Appraisal states the following concerning the site: *"The Bristol Zoo Gardens opened in 1836 by the Bristol, Clifton and West of England Zoological Society. It was set up as a scientific institution devoted to popular culture and is one of the oldest zoos in Europe. By the 1920s the Zoo's popularity declined and the gardens were improved and modernised; by the 1930s the Zoo formed links with the University of Bristol, which forged its reputation as a centre for breeding endangered species. The Zoo, which occupies a 12 acre site, is now one of Bristol's main attractions which has over 600,000 visitors each year"*.

At paragraph 7.1.2, the Character Appraisal explains the predominant characteristics of the area, but largely explains the architectural features of the Victorian villas in the area, which reflects the distinct character of the Zoo itself, given it is contained behind large boundary walls. The Character Appraisal identifies the Zoo and Clifton College as being set amongst large villas, and being characterised by well maintained landscaped space responding to their late Victorian period. Indeed, the Character Appraisal highlights the contribution the Zoo's collection of trees makes to the Conservation Area at paragraph 7.6.10. In discussing the typical land uses and issues in the Conservation Area, the Character Appraisal identifies the main issues affecting residential areas, institutions and churches, open spaces and community gardens, and commercial uses.

The site's significance is provided by physical characteristics of the Zoo, which includes the legible features evident from the original design principles, its historic planting and landscaping, diverse architecture and high boundary walls, and the listed and locally listed structures within the site. As identified by the Character Appraisal, the Zoo is an institution, and a great part of the site's significance is in its communal value; as Historic England explains in their initial comments, this is the "...meaning of the place for the people who relate to it, or for whom it figures in their collective experience or memory". From this perspective, the significance is therefore more in relation to the use of site as a Zoo, than the site's physical features. These features are integral to the site's local listing as an historic park and garden and contributes positively to the historic and architectural character of the Conservation Area, as well as other heritage assets both within the site and in the local area.

There is scope to enhance and better reveal a number of the heritage assets discussed above, most notably the site itself as a locally listed park and garden; the listed and locally listed buildings within the site; and the Conservation Area.

## iii. Application Proposals

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The proposal can be summarised into three main categories of development. Firstly, there are the residential buildings consisting of new-build and converted buildings at the site's perimeter. The northern block spans the northern side of the site, rising from 3 storeys adjacent to the Entrance Lodge building, to 4 storeys for a short section, progressing to 5 storeys until the building's mid-point, where it increases to 6 storeys for the majority of the remaining elevation, dropping at the north eastern corner to 3-4 storeys. The Entrance Lodge buildings will be converted into a community and café use. On the eastern side of the site facing Northcote Road, three new buildings ranging from 3 to 5 storeys are proposed, and the existing Clock Tower building will be retained and extended upwards by 2 storeys. On Guthrie Road, a new 5 storey building is proposed, which will turn the corner from Northcote Road and terminates adjacent to the listed gates. A new 4 storey apartment block is proposed on the other side of the listed Guthrie Road gates, terminating adjacent to Clifton College's music building. Adjacent to College Road, the major intervention proposed consists of the new vehicular access and 5, 4 -storey terraced houses, further development includes the sensitive conversion of the Clifton Pavilion building to a residential use. Secondly, the development includes new homes within the centre of the site in the form of 3-4 storey semi-detached and short terraces, adjacent to the southern side of the new Lake and Parrot House. The Parrot House and Museum buildings are proposed to be sensitively converted into residential dwellings. Finally, the third element of the development consists of the comprehensive landscape-orientated proposals that contribute to the site's open space and historic landscape, including the retention of significant buildings and features such as the Grand Terrace, Bear Pit, Bird Aviary, and Monkey Temple; the provision of open space such as the Lawns, the reshaped Lake, and play areas; and new site entrances increasing permeability to the site.

Aside from the motivations of the Applicant, the proposal is guided by detailed arboricultural and landscape surveys, a heritage assessment, a consultation process with Historic England, engagement with the Council, and community involvement. The Heritage Statement accurately identifies the historic significance of the key structures and features within the site, and this understanding is evident in the approach to the masterplan, which retains buildings of historic significance, including the listed buildings within the site, as well as other buildings that are non-designated heritage assets. The layout of the development retains key landscape features such as the Grand Terrace and appropriately reinterprets the Lake, which has been re-shaped over the course of the site's history. The location of the series of new residential buildings around the perimeter of the site, largely in the position of where existing animal enclosures and other buildings are located, is a sound approach to the development of the site and respects its significance. The Heritage Statement suggests the perimeter block typology takes its cues from over a century of an enclosed, walled site, pierced by openings around historically important features. Through locating the majority of the built form at the perimeter of the site, it also provides openness of the inner site, save for the Lakehouses. However, the scale and massing of these perimeter blocks has been questioned by the Council's Urban Design Team, in response to which amendments have been made to some blocks, most notably the northern block.

The design of the Lakehouses within the centre of the site is of high quality, and officers agree with Historic England's assessment that the Lakehouses suitably interprets the Zoo's otherworldliness. Further, officers acknowledge that there is justification for locating buildings within the inner site, largely as historically there has been buildings within the centre areas. However, the number of Lakehouses within the central areas, as opposed to at the site's edges is criticised, as in addition to detracting from the site's perception of the open spaces as a public place, their location necessitates vehicular movements within the site, which materially detracts from the site's landscape value and

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

runs contrary to the historic nature of the gardens that have always been largely free from traffic. The harm resulting from vehicular movements is minimised by the development's layout and the position of access points, which the Applicant suggests will suitably distribute vehicular movements reducing their impact on the visitors using the site's open spaces. Further, the surface treatment detailed within the Landscape Design Statement suggests the internal roads will be finished in materials to form shared surfaces for pedestrians, cyclists, and cars, which is suggested to create routes, rather than roads.

The Grade II listed Entrance Lodge is proposed to be converted to form a community focussed building, including a community meeting room, offices for a local charity (please note the end-user cannot be controlled as part of any planning permission), and a café. The conversion is sensitive to the building's historic and architectural significance. The Grade II listed Giraffe House within the centre of the site will be converted into a single-family home. The proposal enhances the significance of the building through removing large glazed and steel-framed enclosures from north and east elevations, and the interventions to facilitate the residential use of the building are appropriate. The Grade II listed Aquarium, which was originally the Bear Pit, is proposed to be refurbished to better reveal the original form of the building as a bear pit and will be integrated into the landscape as a feature accessible to the public. The Grade II listed Monkey Temple currently functions as a garden folly, rather than an animal enclosure. The proposal seeks to reopen access up the steps to the Monkey Temple and reinstate the historic Buddha statue. The proposal will introduce planted landscaping around the structure, and it will be integrated into the proposal's open space offering. Adjacent to the Monkey Temple building is the Grade II listed Birds of Prey Aviary, which will be converted from an animal enclosure to a seating area, as with the other garden follies, the proposal provides for re-use of the structure in future and sensitively enhances its significance. The more recent extension to the locally listed Clifton Pavilion will be removed, and the original building subdivided to provide residential accommodation in a sensitive manner. The elevation facing College road will be returned to its former appearance through unblocking windows, which will enhance both the locally listed building and the Conservation Area.

As has been discussed within the Open Space sub-section to Key Issue A, the retention of open spaces and landscaping within the site positively addresses the significance of the site. The proposal enhances the Grand Terrace by replacing tarmac with a more historically appropriate treatment. Similarly, the East Lawn will be retained and improved with the proposed seating. The West Lawn will also be retained, albeit in an altered form, as it is proposed to be a landscape and SuDS feature. The site has historically had a lake/waterbody, which has changed form in response to changes introduced by the Zoo. In keeping with this historical precedent, the proposal reconfigures the shape of the Lake, forming a central landscape feature, with much improved biodiversity credentials. Unfortunately, the herbaceous border will be removed, this is partially mitigated by the proposed herbaceous planting in the Lakeside Garden. Officers realise people have spread relatives' ashes at the herbaceous border, meaning its removal will be upsetting, officers accept there is limited mitigation for this harm. The Lakeside Garden is a new feature to the site and will contribute to the character of the locally listed park and garden. The Play Area proposed is sensitively designed and will support the site's relevance to the wider community. As per the Arboricultural Officer's comments, whilst a significant number of trees are to be felled to facilitate the development, generally these trees are of average quality, whereas the trees most important to the site's significance will be retained. Proposed tree planting around individual features reflects the character of the existing zoo and the features of the related structures: for instance, the planting in and around the Monkey Temple is to be Tibetan/North Indian

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

in character and designed as a place of contemplation, drawing on the character of the opportunity of the space.

Except for the Guthrie Road gates and their flanking walls, and the flanking walls to the North Entrance Lodge, the perimeter walls are not individually designated, or considered as part of the curtilage listing of other listed buildings at the site. Nonetheless, they have been considered throughout the design process to be incorporated into the local listing of the site and have been treated as non-designated heritage assets. An appropriate balance has been struck between puncturing the boundaries of the site that contribute towards its significance, and creating a permeable site that will allow the site to be perceived as a public place. The Urban Design Team considers the proposal's impact on Northcote Road to represent an enhancement to the Conservation Area, similarly the Team suggest the proposal will improve the middle section of the College Road boundary. The Grade II listed Guthrie Road entrance gates will be mechanised with a power and hydraulic supply system to enable access. The proposal also includes the refurbishment of the gates.

iv. Is there harm posed by the development?

*Bristol Zoological Gardens, Locally Listed Park and Garden – Less than substantial harm*

As per the advice of Historic England, the Victorian Society, the Urban Design Team, and many members of the public and interest groups, a considerable aspect of the site's significance is bound up in its use as a Zoo since the early 19th century. The Zoo has closed, which represents a harmful impact to the significance of the site. The proposal is not the reason for the Zoo's closure, but nevertheless if planning permission is granted, it will change the use of the site, which would represent a harmful impact to the significance of the site. The loss of the Zoo from the site is partially mitigated through good design, the preservation of historic legible features, the retention of much of the historic planting and landscape, the reuse and restoration of listed and locally listed structures within the site, and allowances made for future public access.

The Urban Design Team's comments are in part consistent with the assessment provided by the Avon Gardens Trust, who suggests the extent and scale of development, and the site layout, would result in the Zoo Gardens being enclosed by extensive and overbearing blocks of development, which in turn would harm the character and quality of the site and impact the character of the Clifton and Hotwells Conservation Area. The Trust also criticises the introduction of vehicles to the site in relation to the quality of visitor experience and questions the long-term viability of trees on the site. The loss of elements of the landscaping would also pose harm to the asset.

It has also been suggested by the Victorian Society, including other statutory consultees, that the scale and massing of the perimeter blocks will cut the gardens off from the surrounding Conservation Area, and hence harm the significance of the site and Conservation Area. Officers disagree with this assessment, as it does not take sufficient account of the existing boundaries of the site, which are currently demarcated by high boundary walls and/or buildings. The proposal will increase permeability to the site, through its new accesses. Officers do however recognise criticisms of the amount of residential development proposed, as it would negatively impact the setting of the open spaces within the site, in part due to the proposal's residential use adjacent to the open spaces, as well as the scale and massing of the apartments blocks, particularly the northern blocks. This would therefore harm the significance of the site as a historic park and garden, and in turn the setting of the Conservation Area.



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

It is however important to recognise how the proposal reduces potential harm through framing open space with significant existing and proposed landscaping, and the amount of the site that would be dedicated to open space uses. Many comments concerning the impact of the proposal on the site's significance do not recognise the benefits associated with incorporation of the listed buildings at the site into the proposals, whether that be from introducing new uses or incorporating them into the landscape proposals. Further, whilst the proposal no doubt changes the character of the site, it ensures the site will retain important historical features such as the Grand Terrace, the East and West lawns, a lake, historic structures, areas of open space, significant landscaping and historic planting, and a walled character. Further, the proposal also removes many existing ancillary buildings and other unattractive enclosures that do not contribute positively to the character and legibility of the site.

The proposal introduces private residential dwellings to what is currently a quality landscape that is perceived as 'public space', which will cause cumulative harm to the Conservation Area and local historic park and garden (for example, Local View 21 from the Character Appraisal). Further, harm will be caused by the introduction of vehicular movements and car parking to what is currently a largely vehicle free landscape. These private dwellings and their associated aspects will change the perception from being a public to a private landscape in these areas, impacting the communal value of the site as well as the landscape qualities. This element of the proposal will therefore result in a less than substantial level of harm to the locally listed park and garden, as well as the Conservation Area. Nevertheless, the proposals do minimise the harm. Specifically, the Lakehouses within the inner site are architecturally interesting buildings that complement the design aesthetic of the retained zoo buildings and are consistent with the 'otherworldliness' character of the site. Further justification for the location of these buildings is provided by the fact that they are in similar locations to buildings or enclosures previously located within the inner of the site. Their design quality also represents justification for their location, as does their layout and well-conceived relationship with private and public spaces. On balance, the car parking associated with these houses is minimised, and the design intent for the car parking spaces appropriately screens and minimises their visual presence within the site. The service roads will also appear as shared space routes within the site through the careful landscape proposal. In addition, the proposed management approach to restrict car parking to designated areas will also reduce the impact of vehicular traffic within the site. Generally, the layout for car parking across the whole site is considered, and through locating parking areas near access points the presence of moving traffic within the site is minimised.

Some comments from interested parties have suggested the proposals will result in the loss of the site's essential character. Whilst officers recognise the harmful elements of the development, these are not so great that the site would lose its essential character to the detriment of its status as a locally listed park and garden, and the Conservation Area. The redevelopment proportionately retains the historic planting and landscape, as well as key features that have historically contributed to the site's significance (as well as the Conservation Area). The development's approach retains the 'walled' character, and the open space provision and public access will ensure that the site will continue to provide a communal value to Bristol, albeit a different one to the current use.

*Clifton and Hotwells Conservation Area – Less than substantial harm*

The proposed apartment buildings at the edge of the site do reinforce the walled garden character, that has contributed positively to the site being a verdant oasis within the Conservation Area. The Urban Design Team also considers the perimeter blocks to enhance the Conservation Area in certain locations given the existing quality of boundary treatments and buildings. However, officers agree with

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

the comments of many statutory consultees in their criticism of the scale, height, and massing of the perimeter buildings due to its impact on the setting of the Conservation Area. Generally, this part of the Conservation Area is characterised by large Victorian residential villas that front Clifton and Durdham Downs and the surrounding streets, albeit there are also terraced townhouses and Clifton College school buildings. The large residential northern block differs from the established character of the Conservation Area, and will therefore not preserve or enhance it (as recognised from Panoramic View 21 in the Character Appraisal). Over the course of the application amendments have been made, most notably to the northern block where changes have successfully reduced the building's overall massing. The Urban Design Team confirms these amendments have reduced the proposal's impact but suggests further amendments could break down the massing and create a more villa type appearance, thereby reducing the level of harm. These amendments would likely further reduce the number of homes proposed and hence have not been pursued any further given the quantity of development is justified. The scale and massing of the other perimeter blocks around the site also causes less than substantial harm to the character and appearance of the Conservation Area and the setting of listed buildings such as the listed Clifton College buildings on Guthrie Road as demonstrated in views at the junction of Guthrie Road and Northcote Road looking towards College Road (Local View 26, as defined by the Character Appraisal).

The Character Appraisal recognises the distinct character of the site being contained within large boundary walls, compared to nearby Victorian Villas set within a grid layout. In this way, there is justification for the proposal's distinct urban design response. It would be highly challenging, and at worst inappropriate, for the site to replicate a Victorian Villa-type of architecture following a grid layout at the site. Rather, the proposal's layout responds to the character of the site, and the perimeter blocks reinforce the enclosed wall character, and allows for open space to be provided within the inner site. The scale and mass of the northern block also represents a desired urban design response to the A4176 (Clifton Down) and the Downs, as generally larger buildings are used to address open settings. Generally, the proposal will introduce high quality materials to the townscape.

The proposal's cumulative impact with the approved development as the West Car Park has been considered with the development's proposals; including the proposed works to the Clifton Pavilion building, the West Houses, and the proposed access from College Road; and is considered to be acceptable.

Overall, the scale and massing of the apartment blocks around the perimeter of the site will result in a less than substantial level of harm to the Clifton and Hotwells Conservation Area. The assessment of the proposal's impact on the Conservation Area is not limited to this section, given many of the other heritage assets discussed contribute to its significance.

*Bristol Zoological Gardens Entrance Lodges (Grade II) – Less than substantial harm*

The proposal ensures the long-term viability of the listed building through its proposals to convert it to a community focussed use (with a café), to which positive weight should be attributed in the planning balance. The physical works to the listed building are sensitive to its significance, and are limited to: breaking through an inner wall of the building that once formed the outer rear wall of the west pavilion, and adding a white-coloured vent to the 1933 rear gable of the eastern pavilion. The breaking through of the original fabric is restricted to a single doorway width which is necessary to allow a fully wheelchair-accessible toilet within the unisex toilet facilities, which are to occupy the existing ladies' toilets. Officers agree this represents a very low degree of harm that is justified, given the works are

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

the minimum necessary to bring forward the proposed use, and is clearly outweighed by public benefit associated with the re-use of the building, including its provision of accessible toilets. This harm is therefore not a reason to resist the application, generally these proposed works would preserve the features of special architectural and historical interest the listed building possess.

The scale and mass of the northern block adjacent to this listed building results in a level of less than substantial harm, given the current significance of the entrance lodges includes their visual dominance in the landscape despite their low architectural form. This harm has in part been minimised by the stepping down of the northern block's scale adjacent to the entrance lodge, and by allowing separation between the respective buildings.

*Clifton College Listed Buildings – Less than substantial harm to the Grade II listed buildings immediately to the south of Guthrie Road, no harm to the Grade II\* listed buildings*

Clifton College benefits from various Grade II and Grade II\* listed buildings on the southern side of Guthrie Road, including the Warden's Office, North East Wing, Percival Buildings and Wilson Tower, Big School building, and School House. The Conservation Advisory Panel suggests the development within the southern end of the site would be over-intensive with consequential poor relationship with the nearby listed Clifton College buildings. As has been discussed, the proposed scale and mass of the building proposed at the junction of Northcote Rd and Guthrie Road will cause less than substantial harm to the Grade II listed Warden's Office and the Conservation Area. This is largely in relation to views from the junction of Northcote Road and Guthrie Road looking toward College Road (Local View 26 in the Character Appraisal). Generally, the comparative increased scale and mass of the proposed buildings on Guthrie Road will negatively impact Clifton College's listed buildings immediately to the south of Guthrie Road, all of which are Grade II listed. The proposed S1 Block on Guthrie Road has an appropriate design, and as per the advice of Historic England the proposal successfully references the character of surrounding properties and strikes the balance between a building which is clearly part of the family of new buildings on the Zoo site, but also integrates with the conservation area context of surrounding streets. The only concern is the Block's greater height than neighbouring buildings, however the harm to the nearby Grade II listed Clifton College buildings is at the lower end of less than substantial.

The Grade II\* listed buildings within the College's campus and adjacent to the cricket pitch will not be harmed by the development. Generally, views from the south, such as from Clifton College's cricket pitch will not be harmfully impacted by the development. The Urban Design Team advises, the proposal's impact on the setting of the Clifton College heritage assets is reduced in views from the south, such as from the cricket pitch, where only a slight if any impact is visible in views such as from Long View 25 (as identified in the Character Appraisal). There are also a Grade II listed lamp posts on Guthrie Road, they will not be detrimentally impacted by the scale and mass of the proposed buildings on Guthrie Road given they are lampposts, where their significance is mostly owing to their ornate design.

*Giraffe House (Grade II) – No harm*

The proposal includes the conversion of the building to form a single dwelling, the removal of various extensions to the listed building, and the retention of original/significant elements. In this way the proposal will enhance the significance of this listed building and the setting of the site as a locally listed park and garden. The proposal includes new buildings (Lakehouses) either side of the Giraffe House, albeit the new buildings are suitable distances from the Giraffe House, meaning the setting of

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

the listed building is respected. The proposed new use for the Giraffe House represents an optimal viable use for the building, given the closure of the Zoo removed an active use from the building.

*Bear Pit (Grade II) - Less than substantial harm*

The closing of the Zoo removed the active use of the former Bear Pit as an aquarium. The proposal appropriately addresses this cessation of use through incorporating it into the public open space and landscape proposal as an active feature, providing an optimal viable use. More recent extensions and works to the Bear Pit will be removed to better reveal its significance and provide increased landscaping and separation from built form. Contrary to these benefits, the proposal will introduce a large buildings to the north and east of the Bear Pit, which due to their scale and massing will negatively impact the setting of this listed building. This harm is minimised through the distance between the Bear Pit and these new buildings, as well as the discussed re-use of the building and removal of more recent built form associated with the aquarium use. The harm is a less than substantial scale.

*Monkey Temple (Grade II) – No harm*

The plans to restore the Monkey Temple and reuse the building as a garden folly within a publicly accessible landscape. The plans are supported by the Twentieth Century Society, and Historic England and the Council's Urban Design Team raises no objection to the proposal in relation to this listed building. The landscape in the setting of the listed building will be altered, but due to the distance of the apartment buildings from the listed building, the significance of this heritage asset will not be harmed.

*Eagle Aviary (Grade II) – Less than substantial harm*

The Eagle Aviary will be converted into a seating area and sensitively restored, as with the Monkey Temple the Twentieth Century Society, Historic England and the Council's Urban Design Team raises no objection. The much larger Block S1 apartment building is proposed to the south east, which will impact the listed building's setting, but this harm is minimised through the proposed landscaping and the removal of built form in close proximity to the north and east.

*South entrance gates and flanking walls (Grade II) on Guthrie Road – No harm*

The proposed mechanisation of the gates and refurbishment will bring them back into use and ensure their long-term viability as an element of the site that must be operational to allow access to residents and members of the public. The proposal does not pose harm to this heritage asset, but does result in an enhancement to which positive weight should be attributed in the planning balance.

*Clifton Pavilion – No harm*

The proposal will remove the existing side extension and restore blocked up windows, which will better reveal the significance of the Clifton Pavilion building, and will also enhance the setting of the Conservation Area. The proposed works to facilitate the conversion of the building to a residential use is sensitive and will not materially harm the building's significance. The proposed use also represents an optimal viable use of the building. The West Houses are a 3.5 – 4 storey building proposed adjacent to the Clifton Pavilion. Whilst the building has a greater scale and mass than the Clifton Pavilion building, it is set back from the College Road and does has a fairly simple design, meaning it will not compete with the primacy of the Clifton Pavilion in a manner that would detract from its significance.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

*Clock Tower – Less than substantial harm*

The harm posed by the initial proposals to the non-designated heritage asset has been reduced through the amended proposals, and now gains the support from Historic England, the Twentieth Century Society also raises no objection to the revised design. The proposal's adjacent to the Clock Tower will impact its significance, but not detrimentally.

*Theatre – No Harm*

The Twentieth Century Society considers the Theatre on the East Lawn to be a non-designated heritage asset, and their comments do not suggest the proposal will pose harm to this building. Officers agree the proposal will not harm the significance of this building.

*Clifton College Preparatory School – Less than substantial harm*

This locally listed building is situated on the north eastern side of Northcote Road. The buildings introduced on Northcote Road will enhance the setting of the Conservation Area, but will result in a low degree of harm to the setting of this locally listed building due to the proposed buildings greater scale and massing.

*Clifton Music School – Less than substantial harm*

This locally listed building is located on Guthrie Road adjacent to the junction with College Road. The proposed S1 Block is adjacent to this building, which due to its greater scale will impact the locally listed building's setting, albeit the harm will be of a low degree.

*Collection of Houses on Clifton Down Road (Grade II listed) – No Harm*

These buildings are to the west of the site and are separated from the site by such a distance (including the Zoo's former west car park and other buildings) that the proposal will not detrimentally impact their significance.

*The Downs Conservation Area – Less than substantial harm*

The Urban Design Team suggest the proposal will not materially harm the significance of this designated heritage asset due to the topography of the Downs and the screening provided by existing trees. Similarly, the proposal will not materially harm the setting of the Downs as to undermine its status as a valuable urban landscape, as labelled by policy DM17.

*General Considerations*

The Conservation Advisory Panel suggests the reuse of a number of the listed and locally listed buildings within the site for residential homes represents harm to the significance of these assets. The communal value the Zoo contributes to the significance of the Conservation Area and site is acknowledged, but loss of the zoological use from the historic structures at the site has largely been addressed positively through the proposed conversion to residential uses, which represents an

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

optimal viable use, and all remaining listed structures have been incorporated into the public grounds as historic follies, also representing an optimal viable use.

Various internal works have been proposed to the listed buildings, which requires listed building consent and are considered within ref. 22/02889/LA, which accompanies this report. There are no objections to the proposed works to the listed buildings' built fabric, given they are sensitive and contribute positively to the listed buildings' respective significance.

Generally, there is much to praise in relation to the proposal's approach to heritage assets. However, the fundamental harm that officers advise will result from this development stems from the change of use of the site from a zoological use, to a mixed use residential-led development; the scale and massing of the blocks at the perimeter of the site; and the development within more central areas of the site that will harm the significance of the site through their location and associated vehicular movements.

The Table below summarises the proposal's impact on heritage assets, with the remaining subsection explaining how the proposal poses harm.

<b>Table 1 – Assessment of Harm to Heritage Assets</b>	
<b>Heritage Asset</b>	<b>Degree of Harm Posed by the Development</b>
Clifton and Hotwells Conservation Area	Less than substantial harm
The Downs Conservation Area	Less than substantial harm
Bristol Zoological Gardens entrance (Grade II)	Less than substantial harm
Giraffe House (Grade II)	No harm
South entrance gates and flanking walls, Guthrie Road (Grade II)	No harm
Bear Pit (Grade II)	Less than substantial harm
Monkey Temple (Grade II)	No harm
Eagle Aviary (Grade II)	Less than substantial harm
Clifton College, various Grade II and Grade II* listed buildings on the southern side of Guthrie Road, including Warden's Office, North East Wing, Percival Buildings and Wilson Tower, Big School building, and School House.	Less than substantial harm to the Grade II listed buildings immediately to the south of Guthrie Road.  No harm to the Grade II* listed buildings
The site, as a historic park and garden (local listing)	Less than substantial harm
The Clifton Pavilion (local listing)	No harm
Clifton Music School (local listing)	Less than substantial harm

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Clifton College Preparatory School (local listing)	Less than substantial harm
Houses on Clifton Down (Grade II listed), to the west	No harm
Clock Tower (non-designated heritage asset)	Less than substantial harm

## v. Has clear and convincing justification been given for the harm?

The Local Authority are required to take a balanced approach in assessing applications brought before it. Whilst development that poses no heritage harm are most desirable, where development would pose harm the NPPF sets tests, to ensure the degree of harm is justified and whether it would be offset in the overall planning balance by public benefits.

The development poses a less than substantial level of harm to multiple heritage assets including: Grade II listed buildings, two Conservation Areas, and various locally listed/non-designated heritage assets. Paragraph 200 of the NPPF sets out the expectation that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. In terms of paragraph 200 of the NPPF, Historic England recommends that if the LPA considers both the principle and quantum of residential development is acceptable, their view is that the harm has been mitigated as far as possible through good design, and the LPA can proceed to the planning balance in accordance with paragraph 202 of the NPPF. Historic England also advises the LPA of the need to ensure that vehicle movements have been kept to the absolute minimum necessary to service the proposed accommodation. The LPA and Historic England's respective assessments have considered non-designated and designated heritage assets, whilst the LPA considers there to be higher degree of harm to heritage assets than Historic England, their advice remains relevant.

The harm to the designated heritage assets predominantly results from the following aspects of the proposal: the change of use resulting in the loss of the existing, albeit ceased, zoological use; and the quantity of residential development in relation to both its location within the more central areas, and its scale and massing at the perimeter of the site.

The Zoo has closed for reasons discussed within the early sections of this report. Members of the public and some amenity groups, such as the Bristol Civic Society and the Conservation Advisory Panel, have challenged the reasons for the Zoo's closure and relocation to the sister zoo at the Wild Place. In short, they suggest that the applicant must demonstrate that there are no other viable uses for the site, before accepting the current proposal. Officers disagree with this expectation, as the 'Background' section of this report establishes, the Applicant's decision to close the Zoo was reasonable, and there is a need to redevelop the site. This is in part acknowledged by Historic England, who accept that the loss of Zoo from the site appears to be unavoidable. In respect of the proposed redevelopment, the LPA should consider the change of use this represents. The proposal suitably addresses the significance of the site's use as zoological gardens, through including a significant amount of open space that is proposed to be publicly accessible and free from financial charge. Further historic elements of the site are proposed to be retained and sensitively altered to still reflect the former zoological use. These elements of the proposal will ensure the site retains a

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

communal value to Bristol, as whilst the meaning of the place to visitors will change, the site will continue to offer access to members of the public. The proposal will also allow for increased public interaction with a number of heritage assets.

As per the 'Background' section of this report, the zoological use of the site has now ceased, and unless another zoological operator is minded to operate from the site, a form of re-use or redevelopment is inevitable and needed to avoid a vacant site that will quickly depreciate in landscape value if left unmanaged. There is no evidence of another zoo operator wanting or able to take on the site. Ultimately, there is a need for a new use, or a collection of uses that will generate suitable funding to manage the site's extensive historic landscapes and buildings. The proposal represents such a form of development. As will be discussed, the residential element of the development is necessary to fund the management of the open space and to allow for it to be publicly accessible without charge. The residential elements also deliver long term uses for all the historically and architecturally significant buildings at the site, as either much needed new homes, a community/café use, or historic follies integrated within a managed landscape. There is therefore clear and convincing justification for the harm associated with the proposal's failure to retain the zoological use, and the principle of the residential development is accepted with regard to its impact on the significance of heritage assets, most notably the Conservation Area and the site itself as a locally designated park and garden.

Officers have identified the proposal's harmful impact on heritage assets, which is largely due to the quantum of residential development. The Applicant states that the quantum of development has been limited to that required to sustain the future of the site for the medium/long term. Specifically, the Applicant states that the quantum of development is necessary to enable sufficient recurring income to fund the management and maintenance of the publicly accessible gardens and spaces, and to sustain the heritage assets (including the historic gardens) in the long term. In this way the quantum of units is critical to the viability of managing the open spaces (and landscape) within the site at no financial cost to the public. Based on the Society's experience of managing the existing site, and the proposed development, it is expected that managing the open and publicly accessible spaces within the site will cost £200,000 per annum, which the Applicant suggests to equate to £1,275 per unit per annum. The Management Plan explains that an Estate Service Charge will be levied on all non-affordable homes (156 units) and the Clifton Conservation Hub, and that the charge has been commercially tested, and deemed acceptable. Officers have challenged this justification, through asking if the number of units proposed could not be reduced through increasing the Estate Service Charge payable by each open market home. In response, the Applicant provided a document titled 'Assessment of estate and services charges'.

The Assessment of estate and services charges document considers the total Estate Service Charge and Service Charge future owners/occupiers of the market homes will be required to pay. Whilst all market homes will be liable to pay the Estate Service Charge, the document advises that homes within the flatted blocks will also have to pay a Service Charge to cover the day-to-day running costs of respective blocks and their associated private external areas, including items such as buildings insurance, maintenance, repairs, communal facilities and often a sinking fund. The owners/occupier of the houses within the site will not have to pay a Service Charge, as they will be directly responsible for their own service costs associated with their homes, separate to the wider Estate Service Charge. However, as the Estate Service Charge will be commensurate with the floor area of the respective home, it is expected that the houses will have to pay a higher Estate Service Charge than the flatted accommodation, as the houses are generally larger than the flats. The Applicant's case is that Estate



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Service Charge cannot be increased any further, as it would result in charges that would be unaffordable and not acceptable to the market. To evidence this, the Assessment of estate and services charges document builds on the examples included within the Management Plan of other developments. Specifically, the document investigates the level of service charges levied on other Bristol-based developments. To do so, the document focuses on 1 and 2 bed properties, and provides an average service charge for developments including communal grounds and those without:

- With communal grounds: 1 bed flat average service charge of £641 - £1,831 per annum (average £1,350), 2 bed flat average service charge of £928 - £3,277 per annum (average £1,823); and
- Without communal grounds: 1 bed flat average service charge of £641 - £1,831 per annum (£1,105), 2 bed flat average service charge of £1,300 - £3,000 per annum (average £1,705).

The Applicant advises that site and development specific factors means that the likely Estate Service Charge and Service Charge for this development will be higher than other developments in Bristol. The justification for higher service charges at this development is well-founded due to various factors, including: the scale and nature of the gardens, the management of the public open spaces (and historic structures), managing publicly accessible open spaces, insurance and maintenance of the lake, and necessary design-features of the flatted blocks. The Assessment of estate and service charges document states that the average Service Charge for the development will be in the region of £2,000 - £3,150 for a 2 bed property, so between £3,275 - £4,425 per annum, once the £1,275 Estate Service Charge has been added. With this in mind, the Applicant advises that the flatted elements of the development would be subject to some of the highest combined service charges in Bristol, with the highest example being £3,277. As such, the document advises that the *“...likely charges are considered at the limit of what can be achieved in the Bristol market, and anything in excess of those charges are unlikely to be accepted by purchasers; either significantly impact sales rates or preventing sales”* (para 19). The Applicant therefore concludes that *“...to reduce the number of properties would increase the amount each property would need to pay for an Estate Charge, resulting in charges that would be unaffordable and not acceptable to the market”* (para 20).

Through using a 2 bed flat as an average, the document adequately justifies that the cumulative service charges the flatted units will likely be subject to, will be of a level that cannot be increased further without being unaffordable and not acceptable to the market. Whilst the proposed houses will only be subject to an Estate Service Charge, they will have to pay their own associated service charge costs individually, for example building insurance and maintenance costs. Further, their respective Estate Service Charge would likely be greater than average £1,275 figure per unit, per annum, given the charge is suggested to be commensurate to the size of the unit. Taking this all into account, the Applicant has provided sufficient evidence to demonstrate that decreasing the number of units any further would undermine the development commercially, given a higher Estate Service Charge would have to be levied on each unit. Further, decreasing the Estate Service Charge to enable fewer units to be delivered is not an option, given this is the required funding to: manage the gardens, sustain free public access, and secure the wider benefits of the development. Accordingly, there is clear and convincing justification for the harm the residential development will introduce, namely that the quantum of development is required to facilitate the heritage gains and public benefits of the scheme.

The scale and massing of the development is driven by the quantum of development, which is justified. The harm resulting from this has been minimised to a degree through its elevational treatment, for example revisions have been made to Block S1 to better reflect the locality and the massing of the northern block's elevational treatment has been broken up with recesses and other

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

features. Historic England also advises that in their view, the harm has been minimised as far as possible through good design.

The harm associated with locating houses within the inner site has been discussed in subsection iv, as has the justification, but there is further justification associated with their location in achieving the quantum of development. Namely, there being limited scope to relocate the quantum from the Lakehouses to other areas of the site, other than perimeter blocks, where any further increase in the number of homes would cause a greater level of harm to the Conservation Area and nearby listed buildings. Further, policy BCS18 expects developments to provide an appropriate mix of housing types, meaning there is an expectation for the residential development to deliver houses, rather than solely flats.

Historic England advises the LPA of the need to be satisfied that vehicle movements within the site have been kept to an absolute minimum necessary to serve the accommodation. The principle of residential development has been accepted, meaning the introduction of vehicular traffic within the site is necessary to service the dwellings, largely in terms of traffic resulting from residents' parking, refuse vehicles, and deliveries. The location of the proposed vehicular accesses combined with the ability to control the entrances/exits, will limit vehicular movements within the site to those required to adequately service the proposed units. Further, with reference to the Transport Statement, the Applicant highlights the relatively low frequency of vehicle movements within the site, and explains the design intent set out within the Landscape Design Statement, where roads within the site feel more like routes, than roads. Although the site is sustainably located, the Transport Statement and Transport Development Management do not recommend a car-free development. Car parking provision has generally been kept to a minimum, there may be some potential to further reduce parking associated with the Lakehouses, but officers acknowledge that the overall ratio of 0.6 parking spaces per unit is below the maximum car parking standards set out in Appendix 2 of the Local Plan's Site Allocations and Development Management Policies (1 bed unit = 1 space per unit, 2 bed unit = 1.25 spaces per unit, 3+ bed unit = 1.5 spaces per unit). Car parking spaces are generally well-integrated and will be managed to prevent car parking outside of allocated areas. Accordingly, given the quantum of residential development is justified, officers have no evidence to demonstrate that vehicle movements within the site have not been kept to a minimum.

In summary, clear and convincing justification has been provided for the identified harm to the significance of the designated (and non-designated) heritage assets discussed within subsection iv. In accordance with Historic England's advice, the LPA can proceed to the "planning balance" of weighing the less than substantial harm to the heritage assets discussed in subsection iv against any wider benefits offered by the proposals, in accordance with paragraph 202 of the NPPF.

vi. What are the purported public benefits?

The NPPF requires public benefits to be tangible, resulting directly from the development and be genuinely of a public nature. Benefits must conform with the criteria of being social, environmental, or economic.

*Environmental Benefits*

The continued conservation of a heritage asset is a public benefit, even if its historic interest is contested in some way. In explaining the proposals, this report acknowledges how the development

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

assures the long-term conservation of all the designated and non-designated heritage assets within the site. Further, in accordance with paragraph 206 of the NPPF, the proposal better reveals the significance of a number of these listed buildings by removing more recent or modern accretions, representing a further heritage-benefit of the application. A planning condition is recommended to require a phasing plan that ensures these benefits are realised. As well as this, the proposed landscaping scheme ensures that most of the listed buildings are within publicly accessible areas, which together with the free public access to the site, means people visiting the site will have the opportunity to gain a better appreciation of these historic structures. The heritage benefit associated with free public access and the retention and restoration of the listed structures is also recognised by Historic England. Other heritage-gains associated with the development includes the enhancement of Northcote Road and the middle section of College Road.

Public access as a public benefit has been challenged by contributors, suggesting long term public access could be removed or reduced by future residents, who will be responsible to pay for the management of the public areas. This is a concern that has been raised by officers with the applicant throughout the process. As is discussed in Key Issue C, the Management Plan provides an appropriate framework to suitably manage the site in future, and the submission provides confidence that the management fee will be commercially acceptable to future residents. Officers recommend that the s106 Agreement include obligations to ensure future public access for the lifetime of the development, along with appropriate management. Through the planning process this is the limit to the controls available, and officers recommend they are appropriate to secure this public benefit. Some have suggested the free access to the public gardens as a benefit should be given little weight given the availability of open space nearby, however officers disagree, as the proposed publicly accessible areas of the site are distinct to the offer currently provided within the area.

The proposal will have an acceptable impact on the site's nature conservation value, and the Biodiversity Net Gain Assessment suggests the proposal will deliver a significant net gain for biodiversity, and in excess of the 10% expectation outlined in the Environment Act 2021. It is recommended that this environmental benefit is secured by condition to ensure it is realised.

Positive weight should also be attributed to the environmental benefits of locating a mixed-use, residential-led development in proximity of designated centres. Further, the development meets the relevant sustainable building measures expected by policies BCS13, 14, and 15 (as discussed in Key Issue H), meaning the development appropriately addresses expectations regarding mitigating and adapting to climate change, including moving to a low carbon economy.

### *Social Benefits*

This proposal will contribute to the well-established unmet need for homes, including affordable homes, within the city. The commitment to 20% affordable homes on the site increases the supply of homes to those most in need, and within an area with low social housing provision (as per Key Issue F). The affordable M4(3) unit also provides an opportunity for a person/household in need of an accessible home to be supported in the locality.

The public access to the site has been discussed, but positive weight should be attributed to the high-quality open space provided by the development, including the children's play areas, which will help support the communities' health, social and cultural well-being. Further positive weight should be attributed to the Public Art and Cultural Strategy, which provides a tangible vision for how the

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

redevelopment of the site can continue to be culturally relevant to Bristol, which will contribute positively to the site's open space and heritage value, by providing recreation and leisure activities at the site, and engaging with the community. It is recommended that this plan is secured by condition as part of any planning permission.

The proposed Clifton Conservation Hub includes dedicated community floorspace, as well as a café, which will provide a social benefit to the local community, and represents a public benefit of the development that can be secured as part of planning permission.

*Economic Benefits*

There is permanent economic benefit recognised in the increased spending by new residents on local businesses and services. The proposal will also generate employment opportunities, for example in the café and the general management of the site (the Management Plan estimates the equivalent of 6 full time jobs). Officers do recognise the Zoo also provided economic benefits to the area, but it has now closed. The economic benefit to the construction industry during development should also be considered.

vii. Do public benefits outweigh harm where that harm has clear and convincing justification?

The proposal results in a less than substantial level of harm to multiple heritage assets, in each case considerable importance weight must be attributed, in accordance with respective importance of the asset, as set out in legislation and the NPPF. The NPPF requires the Local Authority to place "great weight" in conservation of the historic environment, defining the historic environment as an irreplaceable resource (paragraph 199). Further, the Planning (Listed Buildings and Conservation Areas) Act 1990 Statute places a duty on decision makers to have special regard to the desirability of preserving heritage assets, meaning there is a strong presumption against granting planning permission that would result in harm to heritage assets. This additional weighting in comparison to other planning considerations means it is of fundamental importance in determining development proposals that would affect it.

In this circumstance, officers consider this to be an exceptional case, where the presumption against planning permission being granted has been overridden in favour of the development which is desirable on the ground of the discussed public benefits. As such, and as required by paragraph 202 of the NPPF, the public benefits that would flow from this development are considered to materially outweigh the significant harm that this development would represent to the affected heritage assets.

viii. Summary

Officers advise that the public benefits that would flow from this development, would act to outweigh the less than substantial harm the proposal would represent to the identified designated heritage assets. The positive weight associated with this development, would also act to outweigh the great weight associated with the identified less than substantial harm and the elements of the proposal that fail to meet the expectations of policies BCS22, DM26, and DM31.

**Key Issue C. Green Infrastructure and Landscape Design**

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

i Introduction

This section considers the proposal's impact on existing green infrastructure, as well as the quality of the landscape design, including the needs and practicalities of servicing and long-term management.

The Arboricultural Team recognises the historic nature of the site and its rich history of landscape planting, which is reported to include a diverse population of native and oriental species within high quality landscape. Many of the trees at the site are subject to a Tree Preservation Order (no. 1438), and 19 of the trees are recorded on the national tree register as champion trees. The Team highlights that many species of trees are rare and unusual, which contributes positively to the character of the site and the wider Conservation Area. The quality of the landscape is also recognised within the Urban Design Team's comments, as well as many other contributor comments.

The supporting Arboricultural Report is an assessment of the 218 trees and 45 tree groups on site. The Arboricultural Team's comments considers the details presented within the Arboricultural Implications Assessment and Method Statement to be reasonable. The application is supported by Landscape Design Statements and a number of detailed plans, mostly authored by LUC. The Statement recognises the site's existing significant features, including valuable trees and planting, historical buildings, and the evolution of the site's historic landscape (with reference to the 1836 guidebook plan). When discussing trees, their 'T' number is taken from the provided Arboricultural Assessments.

To help mitigate associated harm to the site's significance from the introduction of residential development to the site, the landscape proposals (including tree protection and retention) must adequately soften and integrate the built form into the landscape. In this way, the quality of the proposal's landscape design is integral to the success of the development. Many aspects of the proposal's landscape design approach have been discussed within the Open Space subsection of this report, so will not be repeated here (see Key Issue A). The Landscape Design Statement is commensurate in detail and quality to the importance of the landscape proposal.

ii Relevant Policies and Guidance

Policy BCS9 concerns green infrastructure, as well as open space which has been discussed. In relation to green infrastructure, the policy states:

*"The integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced. Opportunities to extend the coverage and connectivity of the existing strategic green infrastructure network should be taken.*

*Individual green assets should be retained wherever possible and integrated into new development. Loss of green infrastructure will only be acceptable where it is allowed for as part of an adopted Development plan Document or is necessary, on balance, to achieve the policy aims of the Core Strategy. Appropriate mitigation of the lost green infrastructure assets will be required.*

*Development should incorporate new and/or enhanced green infrastructure of an appropriate type, standard and size. Where on-site provision of green infrastructure is not possible, contributions will be sought to make appropriate provision for green infrastructure off site".*

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The policy also expects national and local sites of biological and geological conservation importance, and where development would impact on the Bristol Wildlife Network it should ensure that the integrity of the network is maintained or strengthened.

Policy DM15 'Green Infrastructure Provision' expects "*The provision of additional and/or improved management of existing trees...as part of the landscape treatment of new development*". Further, policy DM17 'Development Involving Existing Green Infrastructure' expects new development to "*...integrate important existing trees*". It does however allow for "*...tree loss or damage [where it] is essential to allow for appropriate development*", provided replacement trees of an appropriate species are provided.

Policy DM27 expects development to deliver high quality landscape design, which contributes to a sense of place with safe and useable outdoor spaces that are planned as an integral part of the development and respond to and reinforce the character of the context within which it is to be set. The policy also sets out the expectations for developments to be designed to take into account the needs and practicalities of servicing and long term management of public or shared private spaces and facilities, including landscapes areas.

The proposal's impact on the existing landscape is also a relevant heritage consideration, albeit this has been considered within the Heritage Key Issue.

Paragraph 131 of the NPPF highlights the importance of developments retaining and including trees, in a similar manner to the thrust of policies BCS9 and DM17. Paragraphs 174 and 180 of the NPPF are also relevant to the assessment of green infrastructure, but as these paragraphs mostly relate to biodiversity they are considered in Key Issue I, Nature Conservation. Nevertheless, paragraph 180 c is relevant as there is a single veteran tree at the site, to meet this policy the proposal must not result in the loss or deterioration of this tree. Paragraph 180c is consistent with policy DM17 with regard to the protection of Veteran trees. Policy DM27 is consistent with paragraph 130 of the NPPF, which also expects development to include effective landscaping.

The application is supported by a range of documents concerning arboriculture and landscape design, which adequately surveys the existing trees at the site, and accurately explains how trees will be impacted by the development. The Heritage Statement also considers the importance of green infrastructure to the site's significance.

### iii Tree Loss and Mitigation

The proposals will require the removal of 80 individual trees, 31 groups/part-groups and 3 hedges and of these, 44 trees, including 2 mature trees, will be translocated elsewhere on site.

T15 Loquat (*Eriobotrya japonica*) has been proposed for removal to facilitate the development of the perimeter apartments on the northern boundary of the site. The tree is subject to a TPO and is registered as a County champion tree. It is located within very close proximity to the western elevation of the Twilight World building. Translocation of the tree would be very hard to achieve and therefore its loss is justified. Within the landscape plans 3 replacement *Eriobotrya* have been proposed to secure this species longevity within the development.

The Tree Register trees enhance the character of the proposed development and maintain a link to the historic land use as a zoological garden. The loss of the *Malus florentina* and *Metasequoia glyptostroboides* prior to the application process and the further loss of trees T17 *Zelcova serratta* 'Village Green' and T180 *Photinia serratifolia* are a significant loss. Within the landscape plans a

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

single *Zelcova serrata* 'Village Green' and 3 *Photinia serratifolia* have been proposed to secure this species longevity within the development, which does minimise the harm associated with the loss of the existing trees.

Two trees protected by TPO 1438 have been identified for translocation: T72 *Paulownia fargesii* and T87 *Liquidambar styraciflua* 'variegata'. This is a complex process of moving semi mature trees that does not guarantee successful establishment. Within the landscape plan 4 (South) *Paulownia fargesii* and a single *Liquidambar styraciflua* 'variegata' have been proposed to secure this species longevity within the development. 44 trees have been identified for translocation these are made up of *Dickinsonia antarctica*, *Trachycarpus fortune*, and *Cordyline australis*. The Soft Landscape suggests 58 trees of a combination of these species will be planted, and 44 trees will be through translocating trees currently present on site; their locations have been presented on the submitted landscape planting plans. The translocation of these species is more feasible than broadleaf trees due to their root morphology, as such there is no objection in principle.

The Arboricultural Officer has reviewed the trees on site, as well the submitted documents and confirms that tree T38 (Eastern hawthorn - *Crataegus laevigata*) is the only veteran tree on site, and whilst there are other large trees at the site, they do not have sufficient stem diameters or veteran characteristics to be considered veteran trees. Further, the site does not include ancient woodland or ancient trees. Tree T38 will be retained in situ, the development's impact on this tree is considered thoroughly within the next subsection.

In total, 80 trees, 31 groups or part of, and 3 hedges are proposed for removal to facilitate the proposal. The Arboricultural Team acknowledges this is a significant number of trees, but advises that in general, most of these trees are of average quality, whereas the retained trees are largely those of the highest amenity value and quality. In accordance with policies BCS9 and DM17, the trees loss is essential to allow for the development, and on balance the loss of these trees is necessary to achieve the policy aims of the development plan. Further, the harm associated with the loss of green infrastructure has been minimised by retaining trees of high quality and/or significance, translocating trees where appropriate, and including proposals for similar species of trees where loss is unavoidable. As per the expectations of the tree compensation standard set out in policy DM17 and the Planning Obligations SPD, 192 replacement trees are necessary to mitigate the trees proposed to be felled. The landscape plan proposes 470 replacement trees with the translocation of a further 44 trees to maintain the mature character of the landscape. On balance, the proposed tree loss is therefore accepted.

#### iv Tree protection

The Arboricultural Team has reviewed the submitted arboricultural method statement, which is wide ranging considering all key relevant aspects of the construction phase. Specifically, Section 7 of the Arboricultural Report sets out a detailed arboricultural method statement including measures such as: protective fencing, ground protection during construction, root protection measures where proposed hard surfaces will impact root protection areas (cellular confinement systems), restrictions on ground level changes near retained trees, the impact of services and utilities, and recommendations concerning arboricultural supervision through the construction phase. The Arboricultural Team are mostly supportive of the proposed working methodology to protect trees but has expressed concern in relation to a number of measures or potential development impacts. Specifically, the Team has requested that further details of ground protection are provided or secured by condition. Similarly, further details of cellular confinement systems are recommended to be secured by condition to ensure the systems reflect the expected weight from traffic they will need to accommodate.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The veteran tree (T83) is located near the herbaceous border. The tree is proposed to be retained adjacent to the Monkey Temple and its associated landscaping. The Hard Landscaping plan identifies a resin-bound gravel road to the north of the tree which is currently a lawned area associated with the Herbaceous Border, and a natural pennant stone footpath is proposed to the east of the tree where there is currently a hard landscaped footpath. The Arboricultural Report indicates that the road construction is proposed within the root protection area, amounting to 9% of the total root protection area. No-dig construction and protective fencing is proposed within the Arboricultural Report. Section 7.12.1 of the Arboricultural Report sets out that proposed hard surfaces within root protection areas will require specialist footpath and roadway construction, using no-dig construction and systems, such as a Cellweb tree root protection, where loads are dissipated rather than transferring weight to the soil and roots below. Further information of the system is advised to be secured by condition, in order to ensure that the system is of a suitable specification to distribute the weight of future users, vehicles or otherwise. Draft design details of kerb edging together with a short list of the required works have been provided and reviewed by the Arboricultural Officer, who has confirmed that the details to be appropriate. A programme of arboricultural supervision will also be secured, to ensure that any works within the root protection area are undertaken in accordance with arboricultural methodologies. The Arboricultural Report also proposes soil amelioration to address signs of canopy dieback. Accordingly, subject to conditions to secure arboricultural supervision and method statements, details of road construction within the root protection area (including kerb edging), and general tree protection measures, officers advise that the veteran tree will not be adversely impacted by the development. This conclusion follows advice from the Arboricultural Officer, who has confirmed that subject to the aforementioned measures they do not consider that the veteran tree will be adversely impacted by the development in accordance with paragraph 180c of the NPPF.

One of the greatest concerns raised by the Team regards the location of associated underground services and utilities. A combined services and root protection area plan has been provided in response to raised concerns, which has demonstrated that such services can be safely accommodated having regard to root protection area. The drainage plans (Price and Myers) generally suggest that drainage will avoid the root protection areas of retained trees, but there are some locations where conflict with root protection areas is possible. Further, the Landscape Statement indicates rainwater harvesting will be implemented but full detailed plans have not been provided. The ground source heat pump loops proposed below the eastern lawn also have the potential to impact T125, T126, T127, T142, and T147. Officers consider that the application is supported by sufficient evidence to indicate that in principle, the development's underground services and utilities will not materially harm retained trees. In accordance with the Arboricultural Team's advice, it is recommended that a revised arboricultural method statement is secured by condition to address all underground services and utilities.

**v Longevity of Trees Post-Construction**

Elements of the development are proposed near existing trees. The impact of the development during construction has been found to be acceptable, subject to conditions. Residential development close to existing, large, and well-established trees can result in pressure from future residents to severely prune or worse fell such trees in the interests of securing better outlook or levels of daylight/sunlight within gardens and homes. This has been a key consideration for officers and is one that the Council's Arboricultural Team has investigated and advised on within their comments. The Arboricultural Team were particularly concerned with the trees close to the Lake Houses and The Museum and Parrot House. Illustrative overshadowing assessments have been provided for these gardens (see Delva Patman Redler's letter to Savills dated 18.10.22), these provide a helpful



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

indication of the overshadowing from the existing trees. In winter (December) the overshadowing assessment suggests these gardens will receive limited direct sunlight, officers agree with Delva Patman Redler's conclusions, that trees will have a minor impact on levels of direct sunlight within the winter months, given the key driving factors relate to the position of the proposed buildings and the low height of the sun in relation to the gardens. In the summer (June), the results show that one of the trees starts to overshadow the rear of the Parrot House from around 2pm, with the other gardens not receiving additional overshadowing until around 5pm as the trees are generally located to the north and west of the buildings. The results suggest that the gardens associated with the Parrot House and Museum will receive sufficient direct sunlight in the summer. Turning to the Lakehouses, the results indicate that of the 13 gardens considered, 11 will comfortably receive 2 hours of direct sunlight on 21 June, with only garden areas A8, which receives 2 hours of direct sunlight to 48% of its area and A11 which receives at least 2 hours of direct sunlight to 38% of its area, falling below that standard. Overall, the overshadowing assessments suggests the existing trees will not detrimentally impact the gardens of the aforementioned dwellings through overshadowing.

In terms of outlook, the existing trees are all suitably distanced from rear elevations of the Museum and Parrot house, as well as the Lakehouses to the west. There are at least four Lakehouses to the south of the lake, where trees are in rear gardens, fairly close to rear elevations in a manner that will negatively impact outlook. In each case, officers consider that the respective homes will experience sufficient levels of outlook despite these trees. There are also a number of trees to the south of the Northern Block of accommodation, a series of section plans have been provided to demonstrate how the houses will relate to these existing trees. These trees are in public areas, rather than private gardens. The trees will cast a shadow on the northern blocks southern elevations, and will also reduce outlook and levels of light to multiple flats within the northern blocks. This however is not a reason to resist the development, as the layout of the northern blocks provides a high proportion of dual aspect flats, which helps to mitigate any negative impacts on light from external features, such as trees. Further, the southern elevation of the northern blocks includes a large amount of glazing, which will help to maximise levels of outlook and light. The impact of these trees is also limited to a small proportion of homes, largely located on the ground and first floors due to the height of the respective trees. The impacted homes will also benefit from these trees reducing overheating impacts in the summer months to the southern elevations (in accordance with policy BCS13's expectations), further the trees will also provide screening, which positively benefits levels of privacy within the flats.

Whilst officers advise that the proposal's location of homes close to trees is acceptable, there is of course a risk that future residents will wish to heavily prune or fell trees where they perceive that the trees are negatively impacting their amenity. The risk is minimised, as the majority of trees close to homes are not within private gardens, meaning their management will not be the immediate responsibility of residents. Further, the Arboricultural Team has suggested that a further or amended tree preservation order for the trees close to homes is made, officers agree this would contribute positively to the long-term protection of these trees, but this cannot be secured as part of planning permission. Nonetheless, it would be an option for the Council to consider once the development (if approved) is underway and prior to any residential occupiers moving in. It also material to consider that future residents will be aware of the impact the existing trees have on their potential properties in advance of deciding to live in them. Overall, officers advise that the proposal will not unreasonably prejudice the long-term viability of existing trees.

## vi Landscape Design

Policy DM27 expects proposals for the landscape design and planting of development to:

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- i. *Take account of the function, circulation and servicing of places and site constraints including underground services; and*
- ii. *Use trees and other plants appropriate to the character of the site and its context, including native trees; and*
- iii. *Allow sufficient space for safeguarding valuable existing vegetation and the healthy establishment of trees and other planting; and*
- iv. *Integrate sustainable urban drainage systems; and*
- v. *Incorporate hard detailing and materials and planting appropriate to context and fit for purpose, for all elements including surfacing, change of level, boundary treatments, and site furniture; and*
- vi. *Accommodate capacity for local food growing where possible.*

As has been discussed within the Tree Protection subsection, the proposal has taken account of the function of the redevelopment of the site, including how it will be serviced and circulation of all future users of the site. Underground services have also been adequately considered for this stage, and further details are advised to be secured by condition. Details of street lighting, which the Team suggest has the potential to conflict with tree planting, are recommended to be secured by condition to ensure they are adequately incorporated into the landscape proposals in a manner that will not prejudice existing or proposed trees. An approach to incorporating sustainable urban drainage systems has been set out within the Landscape Design Statement and the Flood Risk Assessment and Drainage Report, further details are advised to be secured by condition, which is not unusual for largescale developments. The development does not provide specific proposals for local food growing, albeit the majority of homes have access to private/semi-private amenity areas where small scale food growing could occur. The proposal therefore meets the expectations of policy DM27 with regard to local food growing, but cannot be found to meet the more prescriptive expectations of policy DM15 which expects *“All new residential development should be designed and located to facilitate opportunities for local food growing”*. There is justification for the absence of specific opportunities for local food growing at the site. For example, allotments would not be suitable for much of the open space at the site due to its historic significance and would also reduce the amount of open space available to public access. Accordingly, whilst the proposal’s private/semi-private external amenity spaces will provide opportunity for small-scale local food growing, the proposal includes no specific proposals for local food growing, meaning the development fails this limited part of policy DM15.

The Arboricultural Team advises that the proposals seek to improve the existing management of green infrastructure across the site, with additional tree and herbaceous planting, supported in part by sustainable urban drainage systems, water attenuation, and rainwater harvesting solutions. They advise that the landscape plans fully mitigate tree loss associated with the development, and the trees most important to the site are retained or translocated, save for T15 where the loss is justified. No ancient or veteran trees will be adversely affected by the proposal. The Team advises that the landscape design will provide tree lined streets and deep planting beds with a mixed vertical planting structure, which will increase the species diversity and provide enhanced habitats for wildlife. Further, the Team praises the well-balanced planting scheme, which they suggest is suitably future proofed from the effect of climate change and genus specific tree pathogens. Accordingly, officers consider that the landscape proposals suitably integrate trees and other plants appropriate to the character of the site and its context, whilst retaining much of the historic planting and landscape.

The approach to hard landscaping outlined in the Landscape Design Statement is appropriate for its context, taking inspiration from the local vernacular and benefiting from not being proposed for future adoption as part of the highway. A hierarchy of complementary materials, including natural stone slabs and setts, resin-bound gravel, and concrete blocks, are distributed strategically to ensure that

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

the most suitable materials are provided for each location. The introduction of roads within the site is a key challenge to the site's historic significance. Harm posed by the roads within the site has been minimised through the proposal's use of hardstanding and arrangement to provide a 'shared' space, with more typical pavement/road arrangements being utilised at key vehicular access points to the site. Proposed planting buffers providing defensible space are the principal tool to delineate public and private spaces, and where more typical boundary treatments are proposed, they are appropriate to the landscape in terms of quality, height, and appearance.

Overall, it is acknowledged that the extent of the residential development negatively impacts the setting of the site. However, the proposed landscape design is high quality and appropriate to the character of the site, and hence minimises the harm posed to the site's significance as a historic park and garden. Further, as the proposal includes no specific proposals for local food growing, the development fails this limited part of policy DM15.

## vii Servicing and Management

Policy DM27 expects proposals to *"be designed taking into account the needs and practicalities of servicing and long term management of public or shared private spaces and facilities including communal and landscaped areas and deliver a secure, supportive, safe environment for users that helps to foster a sense of community and minimise the opportunities for crime"*. Further, the policy expects developments that create new public or shared private spaces and facilities to be managed in accordance with an agreed ownership and management plan, which should include the upkeep and the long-term maintenance of those spaces, including landscaped areas.

As the development will deliver new open space for recreation, policy DM16 applies and expects the new open space to:

- i. *Be of an appropriate minimum size and quality; and*
- ii. *Be publicly accessible; and*
- iii. *Be appropriately designed to be safe, usable, integrated into the development site and maximise green infrastructure benefits and functions; and*
- iv. *Take opportunities to connect to the Strategic Green Infrastructure Network; and*
- v. *Include a suitable long-term maintenance programme.*

The Management Plan (authored by Savills) provides a suitable long-term management programme that meets the expectations of policies DM16 and DM27. The Plan aims to provide guidance for the continued management of the public areas of the site, setting out the structure of the approach, with approval of further detail to be secured post granting planning consent once a developer has been selected. The Plan proposes a Bristol Zoo Gardens Estate Management Board is established to oversee the maintenance of the gardens, the management of the public realm and the delivery of a programme of educational and cultural activities. Private gardens are not included, and it is envisaged a separate Management Company will be responsible for this. The Plan proposed the gardens to be open for public access between 8am-7pm in the summer (June – September) and 8am-5pm for the remainder of the year. The 7pm closure in summer is to facilitate the transition between full public access and managed / curated evening events. These opening hours are longer than the Zoo's previous opening hours (10am-5pm), so constitutes an increase in accessibility and with no charge for entry. Officers agree with the Plan, the opening hours strike the right balance between public access and minimising the risk of security or privacy issues during the evening/night-time.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The Plan evidences that consideration has been given to the future cost of maintenance and the securing of sustainable funding model to ensure public access can be maintained and the gardens can remain at the highest quality. An estate service charge model to privately fund the public realm, with a Management Board to be established to govern the estate, is proposed within the Management Plan. This approach provides certainty that the significant costs will continue to be met, and a Management Board will ensure that the site remains a high quality, public open space and represents a wide variety of key interests. The Management Board will appoint a Maintenance Team to carry out maintenance of the public areas of the site, including the hard and soft landscaping components. The team will follow the Landscape Environmental Management Plan, which will be agreed by the Management Board. The Plan includes details of the structure of the Management Board, as well their responsibilities, which includes:

- Public access in perpetuity, during daytime (8am – 7pm between June and September and 8am – 5pm in the remainder of the year).
- Ongoing development and implementation of the landscape strategy and service level agreements.
- The restoration and management of the site's listed buildings.
- The children's play areas.
- The establishment and continued growth of trees, shrubs, hedgerows and amenity grassland.
- Proactive management of the lake and wetlands.
- Ensuring all publicly accessible areas are maintained in a healthy, weed and litter free condition.
- Ensuring viable cost management of funding and service charge.
- Advocacy and representation on behalf of residents, users and visitors to the site in strategic discussion with local community and city stakeholders.
- Programming of educational and cultural events within the Gardens.
- Wayfinding, Security and Health and Safety of the communal areas.
- Definition and operational management of bylaws and regulations for the use of the site.
- Oversight of leaseholder obligations in relation to respectful behaviours and use of communal areas.
- Promotion and coordination of volunteering activities and other outreach and community engagement activities.

The Management Plan sets out the mechanism proposed to secure the long-term management of the gardens. Whilst pre-development costs will be borne by the developer, it is proposed for maintenance costs to be covered by all occupiers of the site (commercial and residential) via management fees, under a category entitled 'Estate Service Charge'. This will form the primary funding mechanism. As such, the quantum of units is critical to viability as most of the cost of upkeep will be borne by the private residents in perpetuity. The Plan reports that the Estate Service Charge has been deemed an acceptable level of charge through commercial testing: to test viability, input on cost has been sought from the Society's internal management team as well as landscape consultants, management, and development surveyors. The estimated costs for running the existing gardens have been assessed against the proposed enhancement of the space, along with benchmarking of other local and national residential schemes. These costs estimates have been assessed against the likely level of service charge receipts to be gained from the private residents without compromising affordability or marketability of the units.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

A key concern has been the potential conflict between residents and those visiting the open spaces provided within the site. The Landscape Design Statement explains the approach to dividing private and public areas of the site to help avoid conflict. The main approach appears to be the use of existing and proposed buffer planting to provide a screen between public and private spaces, which is of a sufficient scale to provide sufficient defensible space for future residents. This approach also contributes to the character of the site, unlike more typical approaches, such as the use of high boundary treatments like fences or walls. The open space is of an appropriate size and quality, with public access proposed. The landscaping proposed and green roofs represents an appropriate response to the Strategic Green Infrastructure Network.

The Management Plan allocates the responsibility for security and health and safety to the Management Board, which further evidences that the open space meets the expectations set out by policy DM16. The Lake and play area are both areas of the site where public safety must be considered, the Landscape Design Statement considers public safety at a high level proportionate to the stage the development is at. It is recommended that further details of safety measures to be implemented within the open space are secured by condition. The approach to lighting development is suitably outlined in the External Lighting Layout plan (ref. MXF-ZZ-00-DR-E-31100, Max Fordham), which predominantly lights the pedestrian and vehicular routes within the site, rather than the soft landscaping or amenity areas, which represents an appropriate response. Full details of external lighting are recommended to be secured by condition as part of a revised landscape statement/plan. The open space will be closed to the public overnight, which is necessary to reduce the likelihood of antisocial behaviour and conflict between the private interests of the residents and the public use of the site. This also explains the rationale for the external lighting proposal.

It is recommended that free public access and management of those areas is secured as part of any planning permission by s106 Agreement. Whilst it is envisaged that the specific terms of the s106 Agreement will be drafted and agreed under Delegated Powers, it is envisaged that the s106 Agreement would secure the following:

- Entry to the areas of the site identified for public access on Page 66 of the DAS, will be provided at no expense to members of the public in perpetuity, between 8am-7pm (June – September) and 8am-5pm for the remainder of the year.
- The ongoing maintenance, upkeep and management of the publicly accessible spaces shall be the responsibility of the Management Board, primarily funded by the residents of the approved development with the exception of those residing in affordable housing.
- The structure of the Management Board, its responsibilities and commitments shall be defined by a Detailed Management Plan.
- The Detailed Management Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby approved, and shall be in accordance with the structure and responsibilities outlined in Chapters 4, 5, and 6 of the approved Management Plan (authored by Savills).

Overall, the development will deliver high quality publicly accessible open space, that has been appropriately designed to be safe and usable.

## viii Summary

In summary, whilst the proposal does include the removal of a significant number of trees, the proposal retains those most significant and includes mitigation in the form of tree planting. Further, adequate tree protection and method statements have been provided for this stage of the proposal to

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

demonstrate that retained trees will be protected during construction. Officers note the potential risks associated with proposing residential development adjacent to trees but find that the proposal will not unacceptably prejudice their long-term viability. The landscape plans are appropriately designed and will provide a high-quality environment for future residents and members of the public visiting the site. The Management Plan provides a strong framework to fund the long-term management of the publicly accessible open spaces and gardens, and provides free public access to the site for the first time in its history. Officers raise no objection in relation to policies concerning green infrastructure and landscape design and management. Planning conditions are recommended to secure tree protection and landscape planting. Further, as discussed, it is recommended that by s106 Agreement, public access to the site is secured, along with long term management.

As the proposal includes no specific proposals for local food growing, the development fails this limited part of policy DM15. This weighs against approving this application and must be considered in the planning balance. This is considered fully in Key Issue L.

**Key Issue D. Urban Design and Residential Amenity for Future Occupiers**

## i. Relevant Policy, Guidance and Material Considerations

Relevant planning urban design policies include: BCS18 'Mix and Balance', BCS20 'Effective and Efficient Use of Land', BCS21 'Quality Urban Design', BCS22 'Conservation and the Historic Environment', BCS23 'Noise / Pollution', DM26 'Local Character and Distinctiveness', DM27 'Layout and Form', DM28 'Public Realm', DM29 'Design of New Buildings', DM30 'Alterations to Existing Buildings', DM31 'Heritage Assets', DM35 'Noise / Pollution', and the UL SPD.

Section 12 of the NPPF highlights the importance of good design, advising it is a key aspect of sustainable development (paragraph 126), and directing development that is not well-designed to be refused (paragraph 134). The Council is yet to publish a design guide or code as envisaged by the paragraphs 128 and 129 of the NPPF, but has adopted the UL SPD that provides further guidance to mainly design-related policies and has published a character appraisal for the Conservation Area. policies BCS20, BCS21, DM26, DM27, DM28, DM29 and DM30 are broadly consistent with the criteria set out in paragraph 134 of the NPPF.

Policy BCS18 is consistent with policy 130f of the NPPF in expecting high standards of amenity for future users, including meeting appropriate space standards.

## ii. UL SPD

The UL SPD includes questions regarding development quality that are designed for applicants, local authority planners and other stakeholders to use throughout the design development of a scheme. Accordingly, the UL SPD represents guidance as to how to assess developments against Development plan policies. Officers will therefore consider the guidance (and questions) included within the UL SPD within this section as an aid to assess the quality of the development regarding relevant design policies.

## iii. UL SPD Assessment – Part 1: Guidance for all major developments - City

Question 1.1 asks if the scheme adopts an approach to urban intensification which is broadly consistent with its setting.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The UL SPD does not set upper limits to densities but does categorise Bristol into three areas and suggest optimal densities for those areas, based on the evidential base for the UL SPD. The site is within the 'Inner Urban Area', where optimal densities in new development are suggested to be 120 units/ha. The more traditional method for working out density is to rely on the gross density, which includes the whole site, including roads and green spaces. The gross density of this development is 42 units/ha, which is less than the typical gross densities in Clifton, which are reported in the UL SPD as being over 90 units/ha. Notwithstanding this, net density calculations are also encouraged by the UL SPD, net site density only includes those areas that will be developed for housing, and hence excludes site areas such as open spaces serving a wider area and significant landscape buffer strips. The net density of the development is 115 units/ha, which is still under the 120 units/ha 'optimal density' for the Inner Urban Area. The density of development is therefore in keeping with the UL SPD's expectation for this area, within the site the quantum of development is distributed so the site's edges, allowing the centre of the site to be undeveloped, save for the Lakehouses.

Figure 3 of the UL SPD identifies the site as being within an area of dominant townscape character and high intensity usage, where there is modest potential for infill on small sites through new build, infill development, conversions, demolition and redevelopment or extension of existing buildings. The site is however distinct to the immediate area, it is a large zoological garden in an area where the predominant character is Victorian villas. This distinction, together with the existing site's characteristics, such as the 'walled' character, does provide justification for the proposal to take a different approach to the typical Victorian villas in the area, or the historic buildings of Clifton College. Further, as per the UL SPD's guidance, larger development sites (greater than 2ha) can provide more potential for new development to define their own setting, the total site area is 4.66ha.

Generally, the approach to pushing most of the development to the site's edges, with smaller scale and less intrusive development within the inner site is an appropriate response to its setting. The density of the development is consistent with the area and the proposal makes an efficient use of the land, considering the residential development it would deliver, as well as the open spaces. The development is largely consistent with policy BCS20. However, as per Key Issue B, there are concerns as to how the development's scale and mass responds to the local context, which is largely a result of the quantum of development proposed.

iv. UL SPD Assessment – Part 1: Guidance for all major developments - Neighbourhood

Question 1.2 considers a development's impacts on the neighbourhood and asks if a development would contribute positively towards creating a vibrant and equitable neighbourhood.

The proposal's housing offer will help to address deficits in identified housing needs, and the Clifton Conservation Hub will provide community floorspace. The development also delivers children's play space, where there is a limited amount in the immediate area. The proposal will also strengthen the neighbourhood's green and blue infrastructure network, with high quality green walking routes being provided within the site, including the provision of publicly accessible open space. The development will contribute positively towards creating a vibrant and equitable neighbourhood.

Question 1.3 asks if the scheme responds positively to either the existing context, or in areas undergoing significant change, an emerging context.

As has been discussed, there is scope for the development to be distinct from the existing context, but there is still an expectation for the development to respect and respond to elements of it. The design

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

rationale can be grossly simplified to publicly accessible central gardens, with limited pavilion-like buildings, enclosed by perimeter apartment blocks. The perimeter apartment blocks would allow the site to continue to retain a distinct character to its surroundings. The central gardens include different character areas, and areas that are planted generously with sinuous curving paths and areas of more open space (the lawns and the lake), which to varying degrees maintains both the current and historic characters of the site. Whilst there is criticism of the number of houses within the central areas, they are all well-designed and officers accept there is precedent for buildings within a curated garden landscape. The proposal also responds well to the context of the site through reusing the historic structures.

The appearance of the perimeter blocks have been criticised. Whilst officers agree with concerns over their height, scale and mass, each perimeter block would provide visual interest. For example, varying brick depths are utilised to echo the seemingly randomised stratification of the existing rubblestone walls. Further, the sense of playfulness and unique location of former zoo is to be signalled by the inclusion of animal silhouettes within the brickwork of these building ends and, for the northern blocks, similar animal silhouettes within the railings of the projecting balconies. Elements of the elevations are recessed to add texture and break up the massing. Balconies are also proposed, and green infrastructure is incorporated into the elevations and roofs.

The development would provide a high quality and well-designed environment, that responds positively to many aspects of the existing site and elements of the surrounding area. However, as per the assessment in Key Issue B, the scale and massing of the perimeter blocks are not appropriately informed by the local context and would negatively impact some internal parts of the site.

v. UL SPD Assessment – Part 1: Guidance for all major developments - Block and Street

Question 1.4 concerns how buildings relate to streets, asking if a scheme would provide people-friendly streets and spaces. The proposal's inner gardens and open space will provide people friendly streets and spaces. The proposal will introduce vehicular traffic into the site, which is harmful, albeit the harm is minimised. The Design and Access Statement sets out the approach to vehicle movements. The under-croft car parking spaces for the Northern Block are accessed from the northern side of the apartment blocks via Northcote Road meaning the traffic will be kept to very edge of the site and not allowed in the gardens. The existing Guthrie Road gates will serve as a one-way entrance to the site, and the new access from College Road will be two-way, between these accesses and the proposed car parking at the edge of the site, car traffic will be kept to minimum and away from the main areas of open space and the Grand Terrace. Delivery and servicing vehicles will be allowed to circulate one-way anti-clockwise around the whole site, the two, two-way access will limit their movements within the site to only what is necessary. The approach to movements should limit any traffic on the Grand Terrace to an occasional basis. Emergency vehicles will be able to access the site sufficiently. An access plan to indicate full details of vehicular movements will be controlled and limited is recommended to be secured by condition.

Question 1.5 asks if proposal would deliver a comfortable micro-climate for its occupants, neighbours and passers-by.

The proposal's layout is primarily motivated by the site's characteristics, but does suitably take into account the site's orientation. The proposal's daylight and sunlight impact on existing residents is considered in Key Issue E, however the proposal will provide acceptable levels of daylight and sunlight for future residents, and the open spaces. The impact of the Northern Block on the Downs



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

and the area immediately to the north has been questioned, however the proposal will not materially harm their amenity values. An overheating assessment has been undertaken, and the existing and proposed green infrastructure is utilised to limit overheating. Given the site's location, there is limited opportunity for active ground floor uses such as cafes, but the Clifton Conservation Hub is appropriately located. Generally, less sensitive land uses such as car parking areas are located where there is less sunlight available. Whilst the proposal does focus large buildings to the site's edges, the proposal is not expected to materially harm the amenity for passers-by.

- vi. UL SPD Assessment – Part 2: Guidance for all major developments - Shared Access and Internal Spaces

Question 2.1 concerns how attractive and welcoming development's accesses. Question 2.2 asks whether schemes will provide internal spaces that are convivial, comfortable and user-friendly.

The majority of the new build apartment buildings have legible and well-lit shared accesses, with direct access to ground floor homes where possible. Access cores generally serve no more than four dwellings on each floor, and where they serve more than four, they are naturally lit and provide dwell space. Accesses are tenure blind. Generally, the proposal will deliver an attractive and welcoming accommodation that encourages conviviality.

- vii. UL SPD Assessment – Part 2: Guidance for all major developments - Outdoor Spaces

Questions 2.3 and 2.4 concern outdoor space, and whether it's sufficient in size and quality.

The UL SPD recommends a minimum of 5sq.m of private outdoor space for a 1-2 person dwelling and an extra 1sqm should be provided per occupant. This can be provided in private balconies or gardens, or in communal gardens. In total, the development provides 4,404.5sq.m of private/communal outdoor floorspace, far exceeding the UL SPD's expectation (see Table 13 of the Private Open Space Assessment document). Most of the proposed homes have direct access to private amenity spaces (95.9%), apart from eight units. Of those units, four are in Block E3, where balconies that extend from the principal elevation have not been provided in the interests of appearance and neighbouring amenity. The remaining four units are within the Clock Tower, where due to constraints associated with the historic building, balconies would not be appropriate. The external private amenity space for seven units is below the recommended amount within the UL SPD, but not by a significant margin. With regard to the units where either no or insufficient private outdoor amenity space is proposed to meet the UL SPD's guidance for individual homes, the development still complies with the UL SPD, which does state that "where sufficient private open space cannot be accommodate on site, due to identified constraints, proximity to existing open space may be considered" (page 62). In this case, the development proposes high quality open spaces on site that will be open to both the public and residents, meaning those living in the aforementioned homes will still benefit from easily accessible and high quality outdoor amenity spaces. Overall, the proposal's provision of private outdoor space is of sufficient size and quality, and whilst a minority of units will not have access to private amenity space, they will still be adequately provided for through the open spaces proposed.

Question 2.5 concerns children's play. The submitted Open Space assessment indicates that the proposal will exceed UL SPD's target of 10sq.m per child, providing a total of 31.86sq.m of children's play space per child. This is provided via the two play areas at the site, and complimented by communal and private amenity spaces that a high proportion of the proposed homes would enjoy.

The development provides sufficient outdoor space.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

ix. UL SPD Assessment – Part 2: Guidance for all major developments - Individual Homes

Policy BCS18 expects residential development to provide sufficient space for everyday activities and enable flexibility and adaptability by meeting appropriate space standards. Policy BCS21 expects development to create a high quality environment for future occupiers while safeguarding existing surrounding development.

The Urban Living SPD sets out requirements for achieving good quality residential developments at higher densities. The questions associated with 'Individual Homes' in the UL SPD concerns:

- Question 2.6 - Whether the proposal's internal layouts are ergonomic and adaptable.
- Question 2.7 – Does the scheme safeguard privacy and minimise noise transfer between homes?
- Question 2.8 – Does the scheme maximise opportunities for natural illumination of internal spaces avoiding single aspect homes?

Generally, the internal layouts of the new buildings meets the recommendations set out by Q2.6, and all the converted buildings are ergonomic and adaptable, albeit their layouts are constrained by the existing building. All the new build apartments blocks includes lifts to each floor. The development includes four wheelchair accessible units (M4(3) wheelchair accessible), meaning the development complies with policy DM4, which sets the principle development plan requirements for accessibility. Three of the units are proposed within the S1 Block, with the remaining wheelchair accessible unit in the Northern Block. Question 2.6 of the UL SPD recommends that 90 per cent of new build housing meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation M4(3) 'wheelchair user dwellings'. 2% of the homes will be M4(3) compliant, albeit the applicant has confirmed that all remaining homes has been designed to be in accordance with the principles of M4(2). The new builds have been designed to accommodate M4(2) requirements, apart from the need for canopies over doors, and whilst there are limitations when converting historic buildings, the converted dwellings can still achieve compliance with M4(2), apart from level access requirements. The proposal meets the principal policy requirement (Policy DM4), and only falls short of the guidance within the UL SPD in relation to M4(3) provision, which in this case is not a reason to resist the application.

Key Issue E assesses the proposal's impact on neighbours, but all proposed accommodation will benefit from acceptable standards of privacy. The majority of the layouts also place similar rooms next to each other to minimise noise transmission, as expected by the UL SPD.

The proposal maximises opportunities for natural illumination of internal spaces and avoids single aspect homes. Specifically, the new apartment buildings are designed to ensure that most (84%) of dwellings are dual aspect, with no single aspect north facing dwellings. Dwellings are orientated towards the Gardens to maximise visual amenity. Where deck access is proposed in Building S1, the access is physically separated from the dwellings to retain privacy and allow for dual aspect living. The majority of homes proposed to be within converted buildings will also be dual aspect.

Overall, the proposal will provide a good quality of amenity for future residents.

viii. UL SPD Assessment – Part 3: Guidance for tall buildings – Visual Quality

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The proposal does not represent a tall building when considering the UL SPD's guidance, as they are less than 30 metres in height, and whilst taller than neighbouring buildings, are considered to represent 'amplified heights' rather than a tall buildings.

## ix. Clifton College Music Venue

Planning policy is explicit in expecting development to deliver high-quality environments for future occupiers (BCS21, DM27, and DM29). The development plan also expects the location and design of new developments to consider existing sources of noise, including the impact of new development on the viability of existing uses by reason of its sensitivity to noise or other pollution (policy BCS23). Policy DM33 reinforces policy BCS23, stating that developments proposed near noise or pollution generating uses should not be permitted where they could threaten the ongoing viability of existing uses that are considered desirable for reasons of economic or wider social need. Policy DM35 adds further expectations for noise-sensitive development, highlighting the need for such developments to provide an appropriate scheme of mitigation to ensure adequate levels of amenity for future occupiers of the proposed development where they are likely to be affected by existing sources of noise. Finally, policy DM35 advises that proposals should not be permitted if mitigation cannot be provided to an appropriate standard with an acceptable design. National planning guidance in the form of the NPPF and PPG are consistent with the policy expectations set out above (paragraph 187 of the NPPF, PPG, paragraphs: 009 (ref. ID: 30-009-20190722), 010 (ref. ID: 30-010-20190722), and 011 (ref. ID: 30-011-20190722)). In accordance with the Pollution Control Team's advice, the proposal is not expected to prejudice the Joseph Cooper Music School's operation as a music school by nature of future residents raising complaints in respect of noise from the school. Similarly, the noise from the school is not expected to unreasonably prejudice the amenity of future occupiers of Block S1. In line with the Pollution Control Team's advice, conditions are recommended requiring an assessment of noise from the Music School, together with the implementation of any mitigation measures deemed necessary.

## x. Crime and Anti-social Behaviour

The Design and Access Statement and Management Plan both includes measures to reduce the likelihood of crime and anti-social behaviour. The Crime Prevention Advisor's comments provides advice as to potential areas of the development that would benefit from certain security standard being met. In the interests of crime prevention and the amenity of residents and its neighbours, a condition is recommended to secure details of measures to prevent and dissuade crime and anti-social behaviour at the site.

## xi. Policy Assessment

Generally, the development responds well to the recommendations and guidance included within the UL SPD. It is evident that future residents will benefit from an excellent standard of accommodation, and the proposal will respond well to and provide for the neighbourhood, for example through the proposed open spaces and increased permeability. However, the proposal's height, scale and massing are not considered to respond well to the area's dominant townscape character, which does represent negative aspect to the proposal and a reason why the application is contrary to certain design-related policies.

The proposal meets many of the expectations of policy BCS21: the layout responds appropriately to the character of the site; the proposal is legible and promotes accessibility and permeability that better connects with the local area than the current site; the development represents an efficient built form that defines public and private space; the development will provide a safe, healthy, attractive, usable, durable and well-managed built environment, which integrates green infrastructure; the mix of uses

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

and spaces proposed will create a multi-functional, lively and well-maintained public realm, which will be complimented by a high quality public art and cultural programme; the development will provide a high quality living environment for future residents; and as Key Issue E demonstrates the proposal largely safeguards the amenity of existing development. The development therefore meets most of policy BCS21's expectations, save for its scale and massing that does not respond well to the local context. The application is therefore inconsistent with this policy.

Policy DM26 is also design-minded but focuses on how the design of developments contribute towards local character and distinctiveness, whereas policy BCS21 is much more holistic. Policy DM26 sets out a number of expectations, the proposal responds well to much of them. For example, it appropriately incorporates existing landscaping, site features, and heritage assets into its design and provides a mechanism to ensure long-term management and use. Positively, the proposal retains existing buildings and structures that contribute positively to local character and distinctiveness, and removes many enclosures and ancillary buildings that are not characterful. Given there is justification for the layout to differ from the local pattern and grain of development, the proposal appropriately interprets the site through its layout and approach. Further, the proposal would better connect the site with the adjacent streets and area and would enhance the edges of the site on Northcote Road and College Road. As per Key Issue B, the proposal's scale and mass would harm some important views within the locality. Some views into the site, such as from Cecil Road via the College Road access would benefit from a reduction in built form within the inner gardens, but the proposed accesses generally reinforce the 'secret garden' character of the site. As discussed in Key Issue B, where the proposal is contrary to policy DM26, is in relation to the proposal's height, scale, and massing failure to respond appropriately to the local character, including designated heritage assets.

Policy DM27 concerns the layout and form of development. The proposal's layout has generally been praised. Whilst the introduction of traffic into the site is a negative of the development, justification has been provided. The layout would create simple, well-defined and inter-connected network of streets and spaces. The development's increased permeability and internal pathways and roads would provide attractive routes for residents and those visiting the site, and details of wayfinding would also be provided as part of the landscape proposals. The hard landscaping proposals, access arrangement and signage would on balance prioritise the pedestrian, and the approach to traffic movements largely keeps historic features such as the Grand Terrace free from traffic. The routes and spaces are all appropriately tree lined, incorporating existing and new green infrastructure. The layout of the block and plots suitably defines public and private spaces, and increase natural surveillance of all neighbouring streets, as well as providing it for the open spaces proposed within the development. The proposal incorporates sufficient private and semi-private amenity space for future residents, and will enable existing and proposed development to achieve appropriate levels of privacy. As per Key Issue C, the proposal will provide a high quality of landscape design, with appropriate servicing and management. The layout also appropriately responds to local climatic conditions. Generally, the proposal responds well to policy DM27's expectations given the layout integrates built form and open spaces well. However, policy DM27 expects the height, scale, and massing of developments to be appropriate to the character of the area, meaning the proposal fails this element of the policy. Hence, whilst the proposal's layout is acceptable, the expression of the built form at the proposed scale and mass is not.

Policy DM28 concerns proposals impact on the public realm. The development will create a safe, attractive, high quality, inclusive and eligible public realm, both within and outside of the site, in accordance with policy DM28.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Policy DM29 expects new buildings to be designed to a high standard of quality, responding appropriately to their importance and reflecting their function and role in relation to the public realm. Many of the policy's expectations have been discussed and found acceptable. For example, the new buildings suitably address the public realm, and will provide appropriate nature surveillance of the external spaces. The buildings incorporate green infrastructure and will provide visual interest, as distinct new part of Clifton, the new buildings as proposed will introduce high quality materials to the townscape. The development responds appropriately to solar orientation, and as per Key Issue H (Sustainability), the new buildings incorporates an energy efficient design. The internal layouts of the buildings will also provide high quality residential environments, compliant with the majority of the UL SPD's guidance. The proposal is consistent with policy DM29.

Extensions and alterations are proposed to many existing buildings at the site, meaning policy DM30's expectations are relevant. Officers advise that generally the works to the existing buildings respect and better reveal their significance. Earlier concerns regarding the proposed works to the Clock Tower have been addressed, as per Historic England's comments. The proposal is consistent with policy DM30.

xii. Summary

Overall, the development would provide a high quality, and on balance well-designed environment in many respects. However, the proposal's design is contrary to policies DM26 and DM27, as well as a small element of policy BCS21, due to its scale and massing failing to be appropriately informed by the local context. This weighs against approving this development and must be considered in the planning balance (see Key Issue L 'Planning Balance and Conclusion').

**Key Issue E. Impact on Neighbouring Properties**

This Key Issue considers the proposal's impact on neighbouring properties in accordance with development plan policies, which require consideration to matters of privacy, outlook, natural lighting, ventilation, and indoor and outdoor space (see policies BCS20, BCS21, DM27, and DM29). These policy expectations concerning existing neighbour's amenity are consistent with the NPPF, for example paragraph 130 of the NPPF which expects planning decisions to ensure new developments create places with a high standard of amenity for existing and future users.

The absence of development within the southern half of the site at the boundary with Northcote Rd of a similar height, scale and mass to the existing buildings on the eastern side of Northcote Rd, means the existing properties within this part of Northcote Rd currently enjoy high levels of outlook across the Zoo, uninterrupted privacy, and good levels of light. The exception to this assessment is the presence of the Zoo's high boundary wall for the majority of the site, and the existing buildings toward the northern half of the Northcote Road, which do currently impact neighbours' amenity. Any development within the site at the boundary with Northcote Road will likely reduce the quality of amenity experienced by neighbours, which is not necessarily a reason to resist the development. This is clear in policy DM29's criteria, where the key test is whether the proposed buildings will ensure that existing development achieves appropriate levels of privacy, outlook and daylight. This assessment is applicable across the site, including with regards to neighbouring properties on Guthrie Road and College Road.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Clifton College has also expressed concerns regarding privacy, largely in relation to safeguarding, which the College suggest would be prejudiced by the proposal, as it introduces residential accommodation with windows looking towards its buildings.

## i. Privacy and Outlook

Tait's House (Clifton College) – there is an acceptable impact due to the distance from the proposed buildings.

10 Northcote Rd/Mansfield's House (Clifton College) – revised plans have been submitted that introduces angled bay windows with obscure glazed windows to 1.7 metres above finished floor level for the windows facing no. 10. This is sufficient to avoid unacceptable overlooking to no. 10. Conditions are recommended to secure this. The existing situation combined with the internal layout of the Mansfield House, which includes dual aspect rooms, means the outlook for this building will not be materially harmed by the development. A first floor office is the exception to this, given it is not dual aspect, its outlook will largely be of the Block E1, which will be overbearing, but the impact is deemed acceptable given its use as an office.

Preparatory School Main Building (Clifton College) – the submitted section plan suggests there is approximately 19.5 metres between Block E1's eastern elevation and the Preparatory School's western elevation. The intervening distance and the nature of the Preparatory School's windows suggests there will be an acceptable impact with regard to privacy. The Preparatory School's fronting gable does extend closer to the development, but the proposal's windows facing the gable section are not to primary rooms, hence privacy will be ensured. Outlook will not be materially harmed due to the intervening distance between the building and the proposal.

Outdoor Sports Courts (Clifton College) – the proposal will overlook these courts, but this is not considered a privacy or safeguarding issue given the courts are already in public view from Northcote Rd, and the new residential apartments are proposed on the opposite side of Northcote Rd.

7 – 8 Northcote Road (Clifton College) – in response to concerns, the internal layouts of the flats on the first and second floors in Block E2 have been amended, so bathroom windows have a direct line of sight to no. 7 Northcote Road, rather bedroom windows as previously proposed – a condition is recommended to secure these windows as obscure glazed. From the proposed bedrooms windows, the window-to-window lines of sight will be suitably oblique to prevent harmful overlooking. Harmful overlooking from the third floor of Block E2 will not occur due to the available angle of views. Plan no. 2605 rev. PL1 indicates that whilst there is only a short separation distance of approximately 11 metres, the angle of the view however means the degree of overlooking is limited to an acceptable amount from the Clock Tower. The outlook currently experienced from the ground floor of these buildings is dominated by the Zoo's existing boundary wall and part of the Clock Tower, meaning the proposal will have a very limited impact. At first floor and second floor, the buildings currently experience uninterrupted outlook due to the break in the buildings within the Zoo at this location. Proposed Block E2 will reduce the amount of outlook available, albeit there is a gap between proposed Block E2 and the Clock Tower that will benefit outlook for no. 8 Northcote Road. Whilst this is a negative aspect of the development, it is material that the existing building is not set back from Northcote Road and currently benefits from a greater than expected level of outlook for an urban location, which is due to the break in building form and the openness within the Zoo itself. Taking this into account, the impact on outlook is acceptable.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Hornby Arts Centre (Clifton College) – the majority of windows facing this building from Block E2 are secondary windows meaning materially harmful overlooking is not expected. There are first and second floor bedroom windows facing east, where angled views toward the first floor windows (and rooflights) will be possible, however due to the angle, materially harmful overlooking is not expected. From the third floor, material overlooking will not be achieved due to the intervening distance and angle of the line of sight, as evidenced in submitted section plans.

The Hornby Arts Centre has no ground floor windows facing the site but does have three first floor windows facing proposed Block E2. The gable end window is a landing window, hence its quality of outlook is less sensitive to change than the remaining two first floor windows that are into the classroom area. The distance between these two windows and proposed Block E2 is approximately 16 metres, meaning their outlook will be reduced as a result of the development, but not to such an extent that the development's impact on the classroom would be considered unacceptable due to the proposal appearing unduly intrusive or oppressive.

Nos. 1 – 6 (inclusive) Northcote Road – the intervening window-to-window distances between the closest proposed blocks (E2 and E3) are in excess of 21 metres, meaning material overlooking will not occur. Similarly, Block E3's balconies will also not result in material overlooking. Block E3 does have a raised podium garden, however the proposed planting strip will increase the distance to a suitable amount to prevent material overlooking from the podium, this is also true for the podium's relationship with Poole's House.

Whilst officers understand the concerns of the residents of nos. 1 – 6 Northcote Road, the height, scale, mass, and position of the development in relation to these properties is broadly consistent with this section of Northcote Road, which is characterised by three to four storey buildings. With regard to building heights, this is acknowledged within the Design and Access Statement, where it presents the heights of all existing and proposed buildings in the area. There is a break in proposed built form between Blocks E2 and E3, which will provide uninterrupted outlook from built form into the site for nos. 3 and 4 Northcote Rd, and will benefit the adjacent properties. However, the southern section of Block E2 will be directly in front of no. 6 and part of no. 5. The proposal ensures these existing properties will continue to experience acceptable levels of outlook due to the intervening distances, the height of the proposed block itself, and by stepping down the height of the building opposite no. 5 (and part of no. 6), from a setback fourth storey to two storeys. The northern section of Block E3 will impact nos. 1 and 2 Northcote Rd, but the Block is designed so the bulk of the building is set back into the site, meaning above ground floor level, there are intervening distances of approximately 25 metres. The height, mass and design of Block E2 combined with the intervening distances with nos. 1 and 2 Northcote Rd will ensure these existing residential properties will continue to benefit from acceptable levels of outlook.

Poole's House (Clifton College) – the intervening distances between Poole's House's facing windows and Block E3's windows and balconies are sufficient to avoid material overlooking. As with nos. 1 and 2 Northcote Rd, the proposed Block E3 will not unacceptably harm the outlook experienced by residents of Poole's House, largely as the first floor of accommodation is set back from the boundary, meaning there is approximately 25 metres distance between the bulk of Block E3 and Poole's House.

Sports Centre (Clifton College) – privacy and outlook will not be materially harmed.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Main Reception Area (Ground Floor), Synagogue and Prichard Room (First Floor) - privacy and outlook will not be materially harmed.

South Town Building (Clifton College) – The South Town building is a Day House, open from 07:30 – 20:00 term time, Monday to Saturday inclusive, pupils use the building before, between and after lessons, as well as free periods, to study, relax and change.

Block S1 is proposed to the north of this building and has windows and decked access on its southern side, facing the South Town Building with Guthrie Road in between. The South Town Building has five large bays composed of multi-pane windows, with approximately six windowpanes per room. The nature of these windows will reduce the amount of possible overlooking due to their size and intervening mullions and transoms. The existing situation is material to considerations, currently the Zoo's Conservation Education Centre has recessed ground floor windows and first floor windows nearly flush with Guthrie Road. Between the first floor windows and the South Town Building's northern elevation is approximately 12 metres. Potential overlooking could occur from three floors of Block S1, which equates to approximately nine flats facing the South Town building. From the decked access some overlooking will occur but given views would be gained from an access-way, the severity of the overlooking is minimised to an acceptable level, which does not constitute a reason to refuse the development. It is also material to note that the existing situation would likely result in similar, if not greater levels of overlooking, given the closer proximity of the Conservation Education Centre's windows. Further, the ground floor windows in the South Town building face directly onto the pavement, meaning views into the ground floor already occur. The windows in the homes within the Block S1 are approximately 18 metres from the South Town's northern elevation (and windows). Section plan 2606 PL1 demonstrates that such lines of sight from the windows and the South Town would be partially interrupted by a balustrade, but materially harmful overlooking will not occur due to the distance combined with the nature of the South Town Building's windows.

The proposal will not reduce outlook gained from the South Town Building's ground floor windows any further than the existing situation, given the presence of existing Conservation Education Centre. Where currently the outlook from the first floor is predominantly the first floor and roof of the Conservation Education Centre, and then the sky, the proposal would introduce a further two floors of accommodation, removing views of the sky. This represents a material reduction in the quality of outlook experienced by the South Town building. The proposal would not however appear unduly intrusive and oppressive, given proposed Block S1 has an interesting southern elevation, which was praised by Historic England. There is also justification for the scale and height of Block S1, given it is similar to other buildings in the immediate area, such as Watson's House. Taking these factors into account, including how the building is used, the proposal's impact on outlook is considered to be acceptable.

Watson's House, Coulson House, 1 Cecil Road (Clifton College) - plan no. 2603 PL1 indicates no overlooking from Block S1 due to the angle and distance of window-to-window lines of sight. Similarly, the proposal would not unacceptably harm the outlook experienced from Watson's House.

Joseph Cooper Music School (Clifton College) - Clifton College's comments suggest the proposal will result in a loss of privacy and potential safeguarding issues through the location of the proposed new pedestrian access adjacent to the Joseph Cooper Music School and from windows within the West elevation of Block S1. The new access would not materially harm the privacy of the Music School, given the only possible overlooking would be from a pedestrian using the new access and looking up toward the Music School's first floor windows. It is also relevant to consider that this relationship



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

already exists, albeit not as an access but a yard area. Final detail of the boundary treatment between the Music School and the new access is also recommended to be secured by condition in the interests of privacy. As with the existing building adjacent to the Music School, proposed Block S1 will have side elevation windows facing the Music School, to avoid overlooking a condition is recommended to ensure those windows are obscure glazed and non-opening below 1.7 metres (when measured from finished floor level).

The proposal will obstruct the outlook from the Music School's side elevation first floor windows in a similar manner to the existing Conservation Education Centre, albeit Block S1 has a greater height. The impact on outlook is not considered to constitute an unacceptable impact.

40 – 48 College Road – the intervening distances between the West House's western-facing windows and the facing windows within 40 – 48 College Road means material overlooking will not occur. Similarly, the proposal will not unacceptably reduce the outlook of these properties.

Approved West Car Park Development – the proposal will not prejudice this approved development through harming its outlook, light or privacy.

Summary – the proposal is generally distanced far enough from neighbours to avoid material overlooking harmful to residential amenity, and where intervening distances are closer, evidence has been provided to demonstrate an acceptable relationship. Further, although the proposal will change the outlook experienced by many neighbours, the impact is not deemed to be unacceptable or harmfully overbearing.

ii. Daylight and Sunlight Impact

The Development plan policy and the UL SPD, both seek to ensure that existing and future occupiers are not prejudiced, while encouraging developments to make an efficient use of land. When considering daylight and sunlight, the PPG advises consideration as to whether a proposed development would have an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers (Para 006 ref. ID: 66-006-20190722). Further, the PPG recommends that proposals should maintain acceptable living standards, clarifying that in practice, this assessment “...will depend to some extent on the context for the development as well as its detailed design” (Para 007 ref. ID: 66-007-20190722). Paragraph 125(c) of the NPPF is material to the assessment of the proposal's daylight and sunlight impacts given the Council has an existing shortage of land for meeting its housing supply, paragraph 125(c) states:

*“Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:*

*c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)”.*

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

With the above in mind, it is important to ensure the application of daylight and sunlight assessments does not prejudice the development's ability to make an efficient use of the site to deliver housing, whilst also ensuring the development does not result in unreasonable impacts on neighbours, including unacceptable living standards for residential uses. It is therefore material to acknowledge that the site is very constrained in terms of where residential development can be successfully located. As such, to make an efficient use of the site and achieve optimum densities, the majority of the development has been focussed on its edges, which does increase the chances of conflict with neighbouring properties. Accordingly, as expected by paragraph 125(c) of the NPPF, a flexible approach is required when applying policies and guidance relating to daylight and sunlight, in order to not inhibit making an efficient use of the site, whilst ensuring the proposal does not result in unreasonable impacts on neighbours.

A Daylight and Sunlight Assessment has been prepared by Delva Patman Redler on behalf of the Applicant, who also provided an addendum letter to address concerns raised by the officers. On behalf of the residents of nos. 1 – 6 Northcote Rd, Antstey Horne submitted a letter concerning the proposal's impact on those residents, in response to which the Applicant provided a short statement as part of the 'Response to Case Officer Note', further comments from Delva Patman Redler (within an email from the Applicant), daylight distribution plans for 1-6 Northcote Rd, and sun on the ground studies for 1-2 Northcote Rd have also been provided by the Applicant. Other neighbours have also expressed concerns, including Clifton College.

In accordance with BRE Guidance, detailed daylight tests are required for neighbouring building where the new development subtends an angle of more than 25 degrees measured from the centre of the lowest affected window in an existing neighbouring building. Detailed daylight tests are:

- vertical sky component (VSC) at the centre of each main window, which measures the total amount of skylight available; and
- no-sky line (NSL) on the working plane inside a room, where room layouts are known, which measures the area that can receive direct skylight and assesses the distribution of daylight around the room.

A loss of daylight resulting from the development will be noticeable if either:

- the VSC at the centre of the window will be reduced to both less than 27% and less than 0.8 times its former value, or
- the area of the working plane in a room that is enclosed by the no-sky line (NSL) and can receive direct skylight will be reduced to less than 0.8 times its former value.

The submitted report is correct to state that these tests are designed for kitchens, living rooms, and bedrooms, with living rooms, dining rooms and kitchen having a greater requirement for daylight than bedrooms. It is suggested that tests for bathrooms and stairwells for example are not required.

The amount of sunlight reaching a room is measured by calculating the percentage of annual probable sunlight hours (APSH) at the centre of windows. If, following development, the APSH will be greater than 25%, including at least 5% of APSH in the winter months between 21 September and 21 March, then the room should still receive enough sunlight. Sunlight will be adversely affected if the centre of the window will:

- receive less than 25% APSH or less than 5% APSH during the winter months (21 September to 21 March); and
- less than 0.8 times its former sunlight hours during either period; and
- the reduction in sunlight over the whole year will be greater than 4% APSH.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Each affected neighbouring property is assessed below.

Tait's House (Clifton College) - The report suggests the proposals will not materially reduce levels of daylight or sunlight.

10 Northcote Road / Mansfield's House (Clifton College) - There are five window openings within this Day House facing proposed building E1, two of which are adjacent to a door and do not light primary rooms. Of the three openings serving primary rooms to the building, they all fail the VSC test and two fail the NSL test, suggesting a noticeable loss of daylight will occur. The ground floor common room opening (F00W7) fails both the VSC suggesting a high adverse impact, albeit it already does not benefit from high levels of daylight. F00W7 also fails the NSL and APSH test, although it does not fail the winter sunlight test. As this room benefits from an east-facing window and will borrow light from the north-facing extension, the proposal's impact on the common room is acceptable. The first floor window F07W3 serves a class room / prep room that benefits from additional side windows, hence the proposal's daylight impact is considered acceptable. The other first floor opening (F01W4) serves a Matron's Office that fails both the VSC and NSL, suggesting a major adverse impact on daylight to this office. As this is an office space and the rest of the building will benefit from acceptable daylight levels, officers do not suggest this is a reason to refuse the application. Officers are also aware it would pass the sunlight hours test.

Overall, there will be noticeable reduction in daylight and sunlight to some rooms, but for the reasons given, the impact is acceptable. Further, officers also recognise the building is built up to the highway boundary, which means any impact of nearby development is exaggerated.

Preparatory School Main Building (Clifton College) - This Clifton College building includes classrooms, offices and the headmaster's office. All the ground floor windows in Room 2 facing the development (F0W9-18) would fail the VSC test by a small degree, which is considered to represent a low adverse impact as the loss is between 7.2 and 8.4%. Further, these windows would likely pass the NSL test, given window F0W18 does, which is representative of all windows in R2, which together with the NSL results suggests an acceptable impact. The ground floor entrance would suffer a low adverse impact to daylight according to the VSC test, but would pass the NSL suggesting an acceptable impact, especially as it is an entrance, and not a class room. Room 4 on the ground floor is dual aspect, the windows facing the development (F00W24-27) would suffer a low adverse impact to daylight according to the VSC test, but would likely pass the NSL and sunlight tests given the results for windows F00W23. Further, given the surveyed windows facing the sports courts all pass the daylight and sunlight tests, it is considered that room 4 would not be unacceptably impacted by the development. The tests results suggest the development will have an acceptable impact on daylight and sunlight for the first floor, including the second floor window. Overall, the development will have an acceptable impact on the daylight and sunlight results experienced by this building.

Outdoor Sports Courts (Clifton College) - Officers do not expect the proposal to have a harmful impact on the daylight and sunlight experienced by the Avenue building at the back of the Sports Courts. Further, the Daylight and Sunlight Report Addendum confirms that Clifton College's sports courts on Northcote Rd will pass the BRE test (results suggests that 99% of the courts will receive at least 2 hours of direct sunlight on the 21st March).

7 and 8 Northcote Road (Clifton College) - These buildings are understood to provide administrative and support functions for Clifton College, including counselling services for the prep school, a chaplaincy and multi-faith school, and EAL and Learning Support services.

The development would have an acceptable impact on No. 8's ground floor rooms, apart from the front office facing the site (F00W5). The results suggest the development would result in a medium adverse impact to amount of daylight received in this room, but an acceptable impact on sunlight. The room above the ground floor office (F01W4) would fail the VSC, suggesting a medium adverse impact

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

on daylight, but pass the NSL and sunlight tests, suggesting a permissible impact. Finally, the tests results suggests the impact on the second floor window (F02W1) is acceptable.

Turning to no. 7's ground and first floor rooms facing the development (F00W2, F01W1), the development would have a medium adverse impact on daylight according to the VSC test, and a significant negative impact on the distribution of daylight within the room (NSL), albeit both windows do pass the relevant sunlight tests. Similarly, the second floor small window (F02W1) would experience a reduction in the distribution of daylight within the corresponding room (NSL), but would pass the VSC and sunlight test. The only justification provided within the Daylight and Sunlight Report Addendum is that no. 7 is an office, and that offices are less important in daylight and sunlight terms and should not be considered as part of the planning process. Whilst officers do agree that offices are less sensitive to a loss of daylight and sunlight than for example residential uses, they nevertheless require daylight, and hence the impact is a negative aspect of the development that weighs against the proposal, and suggests the position, scale and mass of the northern section of block E2 is problematic. The impact is however accepted on balance, as it is not considered to be unreasonable given: the building is not in a residential use or a classroom, but a less sensitive administrative/supportive uses to the functioning of the College; acceptable levels of sunlight will remain; and the requirement in paragraph 125(c) of the NPPF to not inhibit the efficient use of the site.

Hornby Arts Centre (Clifton College) - This Clifton College building has an innovative design where roof-glazing provides the majority of the light the building enjoys, apart from some first floor windows. The two main glazing panels for the ground floor (FOOW1-2) pass the relevant daylight and sunlight tests. The first floor gets light from windows facing Northcote Road and the roof glazing. Windows F01W1-2 fails the VSC test, but the room passes the NSL and sunlight tests. Roof glazing windows F01W5-6 light the first floor and passes the daylight and sunlight tests. First floor window F01W3 will suffer a reduction in daylight, but given this a landing to a stair core this is acceptable. Although the amount of daylight and sunlight the building currently enjoys will reduce, the assessments suggests the building will still benefit from adequate levels of daylight and sunlight.

1 – 6 Northcote Road – following the Residents' Association's submission of a daylight and sunlight rebuttal (Anstey Horne), the Applicant provided a response including using updated room sizes and layouts as provided by Anstey Horne, generally the Applicant suggests this further information does not change their initial conclusions presented in the Daylight and Sunlight Assessment. Anstey Horne then provided another letter to reply to further information provided by the Applicant, which in short suggests that the Applicant's daylight and sunlight assessment is misleading due to inaccurate figures concerning tests such as the VSC, and that the Applicant's figures do not account for an existing tree that is to be retained within the site (14 metre high Lawson Cypress (T119)). The Applicant has responded, reiterating that their assessments are robust and the figures correct, which officers agree with following a review.

Anstey Horne argue that the existing tree within the site should be considered when assessing the proposal's impact, as it would demonstrate that the level of daylight and sunlight enjoyed by nos. 1 – 6 Northcote Rd is worse than is indicated within the Applicant's Daylight and Sunlight assessments. Officers acknowledge that the tree may well impact the Daylight and Sunlight assessment provided by the Applicant. However, the BRE Guidance should be followed when considering daylight and sunlight assessments. Their guidance has been quoted by both the Applicant and Anstey Horne, in the Applicant's case to justify why the tree should not be considered and in Anstey Horne's case to justify why it should be. Officers have reviewed the guidance, the advice is clear within paragraph G1.2, that it is usual to ignore the effect of existing trees on new buildings, although the supporting reasoning refers to most trees not being in leaf during the winter. Whilst this would not be the case for T119 (being a Lawson Cypress), it is apparent from site inspection that the branch structure and form of T119 means that it does not preclude all daylight/sunlight passing through its canopy. Also, paragraph G1.2 does not qualify its guidance to suggest that only existing deciduous trees can be disregarded. Accordingly, it is therefore a reasonable conclusion to not require the existing tree to be considered when assessing a new development's impact on neighbours. However, Anstey Horne relies on

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

paragraph G2.1, which suggests there will be circumstances where existing trees should be taken into account, and gives the example of where a new dwelling is proposed near a large tree, as there may be a concern that future occupants would want to fell the tree in future if it blocked too much skylight or sunlight. Clearly this example is not applicable to this application, where the concern relates to a new development's impact on existing residential accommodation, rather than the longevity of a tree in relation to a new development. The key determining factor in this disagreement is the characteristics of the tree itself, which will no doubt currently impact the levels of light experienced by nos. 1 – 6 Northcote Rd and continue to if the development is approved and built out. The tree is not deciduous, but its canopy formation will allow light to penetrate through from the west to the east (nos. 1 – 6 Northcote Rd). This is evident through inspecting the tree on site and from Northcote Rd, but also from the picture provided Anstey Horne. Further, it is a standalone tree, it does not form part of a wider group or belt that together would be impenetrable. It also will not block the whole width of the gap between Blocks E2 and E3, meaning light will penetrate either side of the tree, and as suggested earlier through gaps in the canopy. Taking these factors into account, it is reasonable to follow the guidance provided by paragraph G1.2 of the BRE, and to not require a Daylight and Sunlight assessment that takes account of the tree.

6 Northcote Road

**Basement Flat:** The results suggest the entrance windows will not be unacceptably impacted. The front-facing bedroom has two windows (B01W2-3), one passes the relevant daylight test, whilst the other fails the VSC and NSL by a small margin, which suggests the proposal would have an acceptable impact on daylight levels. The bedroom would receive acceptable levels of summer sunlight, but would as a result of the development fail to receive the BRE target level of winter sunlight by 1%, which is not a reason to refuse the development given the room is a bedroom and the degree of loss is not overly significant.

**Ground Floor Flat:** The assessment suggests an acceptable impact on daylight and sunlight.

**First and Second Floor Flat:** The side flank window (F01W1) will experience a loss of daylight and sunlight, but does pass the relevant daylight and sunlight tests. The tests results for the remaining windows (F01W2-4 and F02W1-4) suggests the proposal will have an acceptable impact.

5 Northcote Road

**Basement and Ground Floor Flat:** The affected basement windows/room meet relevant tests for daylight and sunlight. The ground floor entrance window (FOOW1) will suffer a reduction in daylight and sunlight, but as this is not a reasonable ground to resist the development as it is not a primary room. The adjacent windows (F00W2-3) pass the relevant tests suggesting the proposal will have an acceptable impact on daylight and sunlight.

**First Floor Flat and Second Floor Flat:** the results suggest a minor decrease in daylight to some of the windows, but all of them pass the daylight and sunlight tests.

4 Northcote Road

No. 4 includes three flats, the exact configuration is unknown, but this has not hindered officers' assessment. At basement level, the two windows (B01W1-2) would experience a reduction of daylight and sunlight, but would nevertheless pass the relevant tests according to the submitted report. The same is true of the ground floor windows (F00W1-2). The window above the door (F00W3) would experience a noticeable reduction in daylight and sunlight, which is deemed permissible given the entrance halls are not primary/habitable rooms, and the nature of the window itself contributes heavily to the results. The proposal would result in some very limited reductions in daylight and sunlight on the first and second floors, but all the windows pass the daylight and sunlight tests (F01W1-3 and F02W1-3).

3 Northcote Road

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Basement flat: these windows (B01W1-3) would experience a loss of daylight and sunlight, but the test results suggest this loss would be limited and acceptable.

Ground floor flat: the three principal windows pass the daylight and sunlight tests (F00W1-3). The flank window (F00W4) above the entrance door will experience a reduction in daylight and sunlight, but this is understandable given the layout of the existing building and permissible due to the nature of the room the window lights.

First and Second floor flat: all the windows on the principal elevation would pass the daylight and sunlight tests (F01W1-4 and F02W1-3).

2 Northcote Road

All the basement windows fails the VSC and NSL tests by a minor margin suggesting a low adverse impact on daylight levels reaching the windows, but the rooms pass the sunlight tests, overall the impact is acceptable. At ground floor level, the entrance door window that currently enjoys limited levels of light, will suffer a further reduction, this is not a reason to resist the proposals as it is not a primary room. Further, the three bay windows (F00W3-5) will suffer low adverse impact to the amount of daylight received (VSC), but the NSL results suggests an acceptable dispersal of daylight will remain, as will adequate levels of sunlight (F00W3-5). At first and second floor levels, the results suggest the impact on daylight and sunlight will be acceptable (F01W1-4 and F02W1-3). The 'Two Hours Sun-on-Ground Study;' suggests an acceptable impact with regard to overshadowing from the development.

1 Northcote Road

The VSC and NSL tests suggests the basement windows will experience a low adverse impact to daylight, which is considered permissible due to the scale of the impact, officers are also aware the basement passes the sunlight test (B01W1-3). On the ground floor, the VSC and NSL results suggests the development will have a low adverse impact on the levels of daylight received, the proposal's impact on the room passes the sunlight test. At first floor level the assessment suggests an acceptable impact on daylight and sunlight, as do the results for the second floor. The 'Two Hours Sun-on-Ground Study;' suggests an acceptable impact with regard to overshadowing from the development.

Poole's House (Clifton College)

This Clifton College building is a dormitory, to aid the assessment officers reviewed plans on the Planning Register.

Lower Ground floor: Window F00W1 will suffer a minor reduction in daylight and sunlight from an existing poor position, hence the window fails the VSC and NSL. Windows F00W2-3 will provide acceptable levels of light, and laundry room windows F00W4-5 will experience a low adverse impact to daylight levels, which is permissible given the nature of the room. The ground floor sitting room (F00W6-7) will also suffer from a low adverse impact to the amount of VSC and a high adverse impact to NSL but will not experience a detrimental impact to levels of sunlight. Although the impact is negative, it is not a reason to refuse the application, especially as the sitting room has a south-facing window that will not be impacted by this development.

Upper Ground floor: the windows (F01W7-11) to a day room will experience a medium adverse impact to the level of daylight entering the room (VCS), and a low impact to the amount of skylight within the room (NSL), which is downside of the proposal, albeit the room will continue to enjoy acceptable levels of sunlight. The kitchen windows (F01W12-14) fail the VSC tests and the impact is on the cusp between a low and medium adverse impact, but the windows do pass the NSL test, which suggests an overall acceptable impact, the room would also continue to experience adequate levels of sunlight. The sitting room is dual aspect and would continue to benefit from acceptable levels of daylight and sunlight (F01W15-21).

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

First Floor: the results suggest the two dormitory rooms facing Northcote Rd windows (F02W5-12) would suffer a low adverse impact to daylight (VSC). Given the low scale of impact and the fact the room would pass the NSL and sunlight test, the impact on these dormitories is acceptable. The dual aspect bedroom (F02W13-18) would not suffer a noticeable reduction in daylight or sunlight.

Second Floor: all of the rooms pass the relevant daylight and sunlight tests.

The proposal is not expected to unacceptably impact the garden area to Poole's House.

Whilst three of the rooms within the building would suffer a loss of daylight, the overall impact on the building's quality of daylight is acceptable, and not a reason to refuse the application or require the scale and mass of the proposal to be reduced.

Sports Centre (Clifton College)

This building includes a ground floor class room (ceramics) with PE rooms above it, and the rest of the building is a sports centre with a chapel adjacent to the North Quad.

The glazed door to the Sports Centre (F00W8) will experience a reduction in daylight, but given it is a door to reception area, this is not a reason to resist the development. The 16 pane window (F00W9-16) will experience a medium/high adverse impact to daylight (VSC) and also fails the NSL test, given it is used as an office to the Sports Centre, this does not suggest the application should be refused. The report has also surveyed a number of port-hole type features on the first floor facing Guthrie Road (F00W17-21), these appear to be vents, hence the results are not relevant. Further, the space behind the vents is understood to get its light from the large roof lantern (F00W23-24), which is not materially impacted by the proposal. The majority of the first floor windows (F01W3-7) pass the relevant daylight tests, apart from two that would receive a low adverse impact (VSC) to daylight, this is acceptable given the nature and the overall results for the room.

Main Reception Area (Ground Floor), Synagogue and Prichard Room (First Floor)

The multi-pane window facing Guthrie Road which lights the main reception area would suffer a low adverse impact (VSC), however all of the west-facing windows (into the North Quad) pass the daylight and sunlight assessments. The ground floor would pass the NSL test. The first floor has similar results, suggesting that it would not be unacceptably impacted by the development.

South Town Building (Clifton College)

This is a day house, the use of which has been discussed above. The building is sensitive to light impacts, albeit less than a classroom or residential use. It has twelve window openings facing Guthrie Road across the ground and first floor serving respective rooms. The dual aspect ground and first floor rooms facing the North Quad and Guthrie Road will continue to experience acceptable levels of light. A similar assessment is made for the rooms at the opposite end of the building, which are dual aspect. The remaining eight rooms across the ground and first floor will experience a medium adverse impact to daylight according to the VSC results and a high adverse impact according to the NSL results. They will therefore experience an adverse impact to the level of daylight they currently enjoy as a result of this development. Officers agree with the Applicant, where they suggest the nature of how the building is used means it is less sensitive to a loss of daylight, and that the impacted rooms are already likely to be reliant on artificial light as they are single aspect and north-facing, meaning they will benefit from limited levels of sunlight. Paragraph 125(c) of the NPPF is also relevant. Whilst a finely balanced judgement, in this case the impact on daylight is not deemed unreasonable.

Watson's House, Coulson House, 1 Cecil Road (Clifton College)

The report suggest an acceptable impact on daylight and sunlight.

Joseph Cooper Music School (Clifton College)

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Although the windows facing Block S1 will experience a loss of daylight, these rooms benefit from additional rooflights/windows meaning that they will continue to experience good levels of daylight, and hence officers consider the proposal's impact to be acceptable.

40 - 48 College Road

All daylight and sunlight tests are passed for all of the windows surveyed in these dwellings, apart from for a single basement window within nos. 42-48 College Road. The windows in question are single windows to each respective basement, and pass the VSC test but fail the NSL test. As there are additional windows within each basement that passes all the daylight tests, officers are confident that these basements will not be unacceptably impacted.

Summary

The proposal generally has an acceptable impact on the levels of daylight and sunlight received by neighbouring properties. There are however a minority of neighbouring buildings where the impact on their daylight and/or sunlight is harmful, but for the reasons provided their impact is deemed acceptable.

## iii. Clifton Conservation Hub

This proposed building includes a café, noise from which has the potential to impact neighbours, for example from extraction equipment and the collection of refuse. Appropriate conditions are recommended.

## iv. Open Space

The proposal secures public access to the site, and includes some features that could give rise to prejudicial impact to neighbours (including future occupiers) through their use, for example from noise from the play area or theatre. Given the layout, these impacts will not materially harm the amenity of existing neighbours outside of the site, and also will not prejudice the amenity of future residents, as the management plan can secure appropriate procedures to reduce the chances of conflict between visitors to the site and future residents.

## v. Construction Phase

The construction phase of this development would have the potential to impact neighbours' amenity, including Clifton College that will be particularly susceptible to noise impacts. In accordance with the Pollution Control Team's advice, a construction management plan is recommended to be secured by condition.

## vi. Summary

In order to achieve an optimal density whilst avoiding building on the most sensitive areas of the site, the proposal introduces built form at the edges of the site at a greater scale and mass to the existing situation, often with windows facing neighbouring properties. The absence of built form at the site's edges, does heighten the impact of the proposal, as many neighbours currently have open vistas across the site. The proposal's impact on neighbour's amenity, both existing and future, has been assessed with regard to privacy, outlook, natural lighting, ventilation, and indoor and outdoor space, and is found to be acceptable in accordance with planning policy and relevant guidance. This



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

assessment has considered guidance within the PPG that highlights the needs for local authorities to consider whether children's best interests are relevant to any planning issue under consideration (para: 028 Reference ID: 21b-028-20150901). Specifically, whilst the amenity value of some of Clifton College's buildings will be negatively impacted by the proposal, the impact is not considered to be unacceptable, and hence does not conflict with the best interests of the pupils who attend Clifton College. Overall, the proposal is considered to have an acceptable impact on neighbouring amenity.

**Key Issue F. Mixed and Balanced Communities (including Affordable Housing)**

## i. Relevant Policies

Policy BCS17 'Affordable Housing Provision' expects affordable housing to be sought from residential developments of 15 dwellings or more through negotiation. At this Site, the percentage target for affordable housing provisions is 40%. The policy highlights that where this target is not met, "...developers will be expected to provide full development appraisals to demonstrate an alternative affordable housing provision". Material to the application of policy BCS17 is the Council's Affordable Housing Practice Note, July 2022, (AHPN), which helps to explain how policy BCS17 is implemented. The AHPN outlines a 'Threshold' approach, where to encourage the early provision of affordable housing above the level currently being delivered, the Council will operate a threshold approach to policy BCS17 applied within the Bristol Inner West and Inner East zones. In these two zones applications meeting or exceeding 20% affordable housing can follow a 'Fast track' route. However, this is principally subject to the applicant/developer agreeing to both commence development of the scheme within 18 months of the permission being granted, and a viability testing process if no confirmation of commencement of the development of the scheme has been received within 18 months of the date of the grant of planning permission. Where such arrangements are agreed, the benefit of achieving early delivery of the development and its affordable housing is treated, when applying policy BCS17, as a material consideration which is capable of outweighing the need for compliance with the full requirements of the policy, with a safeguard to require viability testing and potentially increased affordable housing if the development is not commenced within the 18 months period.

Policy BCS18 requires that all new residential development should maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities. The policy goes on to include a number of aims for development to meet the requirements of policy BCS18. These relate to affordable housing need; housing demand; diversity and imbalance of housing in a local area; requirements of a changing population; and the employment of imaginative design solutions.

## ii. Affordable Housing

The proposal offers 40 units as affordable housing, which whilst not meeting policy BCS17's expectation, it does exceed the 20% target introduced by the AHPN. As per the Housing Enabling Team's comments, the applicant has confirmed they will use the 'Fast Track' route, the terms of which will be secured via the s106 agreement in accordance with the AHPN. Although the proposed affordable housing contribution does not meet policy BCS17's expectation, it does accord with the approach set out within the AHPN, which attracts weight when considering policy BCS17. Officers recommend the number of affordable homes proposed to be secured by this development is

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

sufficient, provided that there is a commitment to secure early delivery and a default mechanism for viability testing if this does not occur.

In terms of tenure, the applicant has offered a mix of 75% (30no.) Social Rent and 25% (10no.) 'First Homes' which is in accordance with Section 3.5 of the AHPN. Officers realise the AHPN prefers Shared Ownership rather than First Homes, but as per the AHPN, other tenures including First Homes are acceptable. All of the First Homes will be 1-bedroom homes, ordinarily a more diverse mix of housing types would be expected. However, as per the Housing Enabling Team's advice, to remain in within the £250,000 price cap that First Homes are subject to, it is understood why the 1-bedroom home are proposed, as larger First Homes house types would likely exceed the price cap. The Housing Enabling Team do not raise issues with the housing types for the Social Rent homes, which are composed of a more diverse housing mix, including 19nos. 1-bedroom homes, 6nos. 2-bedrooms homes, and 5nos. 3-bedroom homes. Whilst the Housing Enabling Team highlights the mix of units does not present the ideal range of dwelling types, they nevertheless acknowledge the positive contribution the proposal's affordable housing offer will make in area where there is limited affordable housing at present. In total, 4 nos. M4(3) 'wheelchair user dwellings' are proposed, which meets the expectation of policy DM4. Three of these wheelchair user dwellings are proposed to be allocated as Social Rent homes in Block S1, which will help meet the high demand in Bristol for affordable housing for people with disabilities. The Housing Enabling Team has asked if the final wheelchair user dwelling could also be allocated for affordable housing, but in this case, officers advise there is no policy need for the development to do so, given 3nos. wheelchair user dwellings are already proposed to be affordable homes. A condition is recommended to ensure the units proposed to be wheelchair accessible meet the full requirements of Building Regulation M4(3).

The First Homes are proposed to be in Block E2 (2nos.) and Block E3 (8nos.), four of which do not have access to private external amenity space, but are nevertheless provided for by the open spaces within the development. The Social Rent homes are all located in Block S1, all have access to private external amenity space. Within the Housing Enabling Team's second comments, concerns were expressed regarding the concentration of affordable homes, particularly within Block S1, which is proposed includes 30no. Social Rent homes only. In response to this criticism, the Applicant responded with justification, including examples of other approved developments with similar arrangements in Bristol. It is also material to consider the Registered Provider's needs, who generally prefer to have affordable homes located in a single block of accommodation, as they find it easier to manage the common areas and service charges can be less. Within the Housing Enabling Team's latest comments, they raise no objection to the development in respect of the concentration of affordable homes, acknowledging the nature of the scheme and the fact that the accommodation is spread across three blocks. Block S1 has car parking for the 3nos. wheelchair user dwellings, but no car parking spaces for the remaining 27nos. homes. Whilst officers acknowledge the sustainable nature of the site, the Housing Enabling Team suggests a minimum of 10% of the total car parking provision should be allocated for residents of the affordable homes. An appropriate proportion of allocated car parking spaces for the affordable homes will be secured within the s106 agreement.

In accordance with policy BCS17, the AHPN, and the Planning Obligations SPD, the affordable housing proposed would be secured by s106 Agreement. Matters such as the Approved Housing Provider, Rent and Service Charges, and Enabling Fees will be addressed within the S106 Agreement.

iii. Mixed and Balanced Communities

Policy BCS18 requires that all new residential development should maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities. As has been discussed, 156nos. (80%) are proposed as private/open market homes,

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

with the remaining 40nos. (20%) being proposed as affordable homes. In addition to policy BCS17 and the AHPN, positive weight in accordance with policy BCS18 should be attributed to the 40 nos. affordable homes, given their contribution to the mix of housing types in the Clifton Ward.

The proposal includes 37no. (18.9%) houses and 159nos. (81.1%) flats, meaning the proposal will maintain the housing mix in this regard, given the 2021 Census data recorded the Clifton Ward as being composed of 24.4% houses and 75.6% flats. In terms of bedroom composition, the proposal includes 60nos. (30.6%) 1-bedroom units, 71 (36.2%) 2-bedroom units, 34nos. (17.3%) 3-bedroom units, 27nos. (13.8%) 4-bedroom units, and 4nos. (2%) 5-bedroom units. The 2021 Census data suggests that in the Clifton Ward, 25.5% of homes have a single bedroom, 40.2% are 2-bedroom homes, 16.2% of homes have 3-bedrooms, and the remaining 18.1% homes have 4 or more bedrooms. As such, the proposal will maintain the mix of housing sizes in the Ward. In terms of housing tenure, the submitted Housing Market Assessment suggests that within the BS8 postcode (which officers acknowledge includes a larger area than the Clifton Ward) home ownership is relatively low compared to Bristol due to the high proportion of rental stock (rental stock: 48% in Clifton and 25% in Bristol). Although any planning permission would only be able to control future tenure in relation to the affordable homes, the proposal would nevertheless offer an opportunity for greater home ownership within Clifton.

The proposal meets the expectations of policy BCS18 through appropriately maintaining and contributing to the mix of housing tenures, types and sizes to help support the creation of mixed, balanced, and inclusive communities. Further, all units meet the space standards, will benefit from an acceptable quality of residential amenity.

iv. Summary

Overall, officers advise the mix of development proposed will help meet identified housing needs, in terms of both the proposed affordable and open market homes, to which significant weight should be attributed.

**Key Issue G. Highway Safety and Transportation**

i. Relevant Planning Policies

Policy BCS10 'Transport and Access Improvements' expects developments to be designed to reflect the transport user priorities listed in the policy, whilst also considering the needs of disabled people. The policy expects developments to be located where sustainable travel patterns can be achieved, minimising the need to travel, especially by private car, and maximise opportunities for the use of walking, cycling and public transport. The policy goes on to set out expectations for developments to be designed and located to ensure the provision of safe streets and reduce as far as possible the negative impacts of vehicles such as excessive volumes, fumes and noise. Further, the policy requires proposals to create places and streets, where traffic and other activities are integrated and where buildings, spaces and the needs of people shape the area.

Policy DM23 'Transport Development Management' expects developments to not give rise to unacceptable traffic conditions and to provide:

- i. Safe and adequate access for all sections of the community within the development and onto the highway network including designs which secure low vehicle speeds; and*

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- ii. *Adequate access to public transport including, where necessary, provision for public transport improvements; and*
- iii. *For appropriate transport improvements to overcome unsatisfactory transport conditions created or exacerbated by the development; and*
- iv. *For pedestrians and cyclists including, where appropriate, enhancing the pedestrian and cycle network and, for major non-residential schemes, providing adequate changing, shower, storage and drying facilities for cyclists*

In relation to parking and servicing, policy DM23 refers to Appendix 2, and expects developments to:

- i. *Provide an appropriate level of safe, secure, accessible and usable parking provision having regard to the parking standards, the parking management regime and the level of accessibility by walking, cycling and public transport; and*
- ii. *Provide appropriate servicing and loading facilities*

## ii. Access Arrangements

The proposal introduces seven pedestrian accesses and three vehicular accesses. All access points would be level with no steps proposed and would be gated. The majority of the gates would be open during the day but closed at night, with an access control mechanism in place to allow residents and deliveries to continue to enter the site even when the gates are closed.

A new priority junction is proposed from College Road just south of and opposite Cecil Road. The junction is to be in the form of a bellmouth arrangement, with a 6 metre wide access road continuing into the site. Visibility splays of 2.4m x 33m are proposed from the access in each direction along College Road. Gates across the access road would be set back some 15m into the site. During the day the gates would remain open enabling residents and visitors to access the site, but would be closed at night with resident only access permitted by way of fob system or similar. Deliveries would also be permitted access. Signage is also proposed at the site access to limit vehicle access to the site to those travelling to the residential properties only, identifying that public access is not permitted for vehicles except for the Clifton conservation hub disabled parking. Works in the highway will be necessary to facilitate the new access, including the loss of on street parking space and a traffic calming feature. A condition is recommended to secure details of the works in the highway and to ensure they are implemented in a timely and acceptable manner.

The existing entry gates provided on Guthrie Road to the south of the site are proposed to be reused. Cyclists would be permitted to use the central gates two-way, with cars only permitted to enter the site through these gates. In addition the side gates would be available for pedestrians to use. These gates would be open during the day and locked at night, with only access then permitted for residents by way of fob system or similar.

A gated 4.8m wide resident only car and cycle two-way access is proposed in the north east of the site with access from Northcote Road. The vehicle access gates are proposed to be closed at all times and would only be able to be opened by those residents with fob (or similar) access living in the northern part of the site. A pedestrian access is proposed to the north of vehicle entrance via a 'Pocket Park'. As a result of the new access provision some existing on-street parking bays along the northern section of Northcote Road would be lost. On the western side of the road around three

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

parking spaces would be lost to allow for the access location and build out, plus three for the visibility splay to the right. In addition around five spaces would be lost on the eastern side of the street.

The movement of vehicles within in the site has been discussed in Key Issue D.

### iii. Highway Safety

Clifton College has expressed concerns regarding the access on Guthrie Road, largely in relation to the volume of traffic the access would result in and the potential of conflict with their pupils. Officers realise that large numbers of pedestrian movements, primarily those of school aged vulnerable users, is generated by the College, which has facilities on both Northcote Rd and Guthrie Rd. This includes pupils being dropped off and picked up on both Northcote Rd and Guthrie Rd. The College's representations argue that the proposals do not mitigate the impact the redevelopment will have on the College's pupils and the associated road safety dangers. With reference to advice from Highgate Transportation, the College requests additional transportation modelling and other relevant transportation research is undertaken by the Applicant to ensure that the College's concerns have been taken fully into account.

Clifton College raises understandable concerns, and whilst proposals impact on highway safety is always a planning concern, it is heightened given the number and vulnerability of school children who use the surrounding highway, not just when going to and from school, but also during the school day when walking to lessons. Transport Development Management's comments suggests the College's concerns in relation to highway safety have been addressed by the Applicant, and as such they raise no objection. The amount of vehicle movements has been considered by the Applicant within their Transport Statement, which reports that between 7am and 7pm, there will be typically 72 car movements via the Guthrie Road access and 98 via the Northcote Rd, with the majority being via College Rd that will be the only access for delivery and other service-related vehicles (Appendix 13.3). A condition securing access arrangements is recommended. With regards to movements in peak times, the Transport Statement advises:

*"Whilst there is proposed to be a small increase in vehicle trips at the Guthrie Road junctions in the peak hours this equates to one additional vehicle every eight minutes in the morning peak hour and every four minutes in the evening peak hour. This is not a material increase in traffic. Over the course of the day there is likely to be a reduction in traffic on Guthrie Road and other local streets surrounding the site as these streets are currently used for parking by visitors of BZG, and these trips are being removed from the network".*

Weight must also be attributed to the site's fallback position, as the Guthrie Rd gates could be used as a vehicular access by the existing use without any need for planning permission. Similarly, the Northcote Road entrance is near an access to the north car park for the Zoo, and both Northcote Road and Guthrie Road have on-street parking bays where visitors to the Zoo could have parked, hence it is reasonable to consider these existing vehicle movements when assessing the proposal's impact on highway safety.

The proposal would introduce pedestrian access either side of the main gates on Guthrie Road, further increasing the awareness of those entering the site via this access for pedestrians. Further, Guthrie Rd already includes many traffic calming measures that encourage motorists to travel at an appropriate speed. Visibility at the access is also acceptable, meaning motorists entering the site

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

would be able to clearly see pedestrians and enter accordingly. The majority of those motorists accessing the site will also be aware that they are in an area where Clifton College has many buildings, meaning they will be expecting to see pupils from the school walking on the surrounding pavements, including those near the Guthrie Road entrance.

Clifton College has also expressed concerns in relation to pupils walking on College Road and Cecil Road, for example to access playing fields ('New Field'), particularly in relation to the proposed new access on College Road and the additional traffic they expect the proposal to generate. Transport Development Management has not however objected with regard to these concerns, and hence there is insufficient evidence to indicate that the proposal will have an unacceptable impact on highway safety. The new vehicle accesses on Northcote Rd and College Rd are both designed to comply with Manual for Streets, providing suitable visibility, and hence are not expected to result in road safety concerns. Associated works in the highway will be secured by condition.

Generally, the Transport Statement suggests that whilst in the morning peak hour a comparable level of traffic would be generated by the proposal and the existing use, in the evening peak hour and over course of a 12 hour day (7am and 7pm), there would be a net traffic reduction. Officers agree with the road safety review provided within the Transport Statement, which suggests the development would not have a detrimental impact on local road safety, in line with paragraph 111 of the NPPF. Transport Development Management also raises no objection in this regard. Further, Transport Development Management recommends that the scope of the s278 Agreement (under the Highway Act 1980) that the Applicant is required to enter, is secured by the s106 Agreement. The area the s278 Agreement will address shall include the highway surrounding the site, up to the back of footways on the opposite side of the respective roads to the site, including Northcote Road, Guthrie Road, and College Road. The s106 Agreement shall indicate the extent of the works that should be considered as part of the s278 Agreement, including road safety audits, which will identify any further road safety matters resulting from the development and secure appropriate mitigation works to address them. Any planning permission would secure works in the highway in the interest of road safety by way of a condition to require general arrangement details of highway works.

Comments have questioned the Applicant's Transport Consultant's reference to the site's lawful use as a zoo, and their suggestion that the transport and highway safety impact associated with the active use of the Zoo should be taken into account when considering the proposal's transport and highway safety impacts. Specifically, this has been criticised as for other matters, the Applicant's case has suggested that the active use of the Zoo has ceased. Officers understand the criticism, but advise it is common for transport-related assessments to consider and compare proposals against the lawful use of a site. Further, in this case, the transport-related baseline of the lawful use is helpful and material, as it demonstrates that the development's impact will be reduced compared to the Zoo's impact on the highway when it was operational.

#### iv. Movements within the Site

The internal streets have been designed to provide a liveable neighbourhood taking into account the needs of pedestrians and disabled users moving around the site. The provision of three vehicle access points and vehicle turning areas around the site minimises the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow vehicle speeds through the space and encourage free flow of pedestrian and cycle movement. The internal streets around the site would be

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan is recommended.

## v. Car Parking

The proposed new accesses on College Road and Northcote Road will result in the loss of on street car parking spaces, which is considered to be acceptable given the demand associated with zoological use for on street parking in the vicinity will reduce. These spaces are also available to permit holders, but TDM has not objected to this element of the development.

A total of 120 car parking spaces are proposed on-site, 118 allocated for residential use, and two for the conservation hub, this equates to a provision 0.6 spaces per home. Of the allocated car parking spaces 71 are proposed for the apartments, of which 61 would be undercroft within the buildings on the northern and eastern perimeter of the site, plus four surface level parking spaces in the north, and a further six in the south of the site. Four of the car parking spaces would be designed as disabled bays, meeting the expectations of Appendix 2 of the Sites Allocation and Development Management Local Plan. The Transport Assessment suggests that car parking for the apartments would be allocated to specific apartments so residents are aware as to whether they have a car parking space or not prior to moving to the site. All houses would have at least one car parking space, with 10 of the larger properties allocated two spaces, giving a total of 47 car parking spaces allocated to the houses proposed on-site. The parking spaces for the houses are a mix of on plot parking with pergolas over the bays, nearby surface level parking perpendicular to the circulation route around the site, or within a small parking court. All of the houses with on plot car parking are proposed to have an electrical socket to allow for electric car charging. For the parking spaces allocated to the apartments and those for the houses which are not on plot, 20% of the car parking provision would also be provided with electric car charging points. The remaining parking for the apartments would have passive provision, with ducting in place to allow future installation of electric vehicle charging points.

Visitor parking for residential dwellings would be provided in the locality, where on-street pay and display bays are available. Two dedicated disabled parking bays for the Clifton conservation hub are also proposed on-site to the rear of the hub building. In addition, disabled visitors to the hub would be able to make use of the on-street parking on College Road. A car club space is proposed as part of the scheme, and will be provided on public highway so that it would be available to existing local residents as well as residents of the proposed development. The exact location of the car club car is to be agreed by condition.

Generally, the level of car parking proposed is considered appropriate for the development, and has been minimised, as the ratio of 0.6 spaces per dwelling reflects.

## vi. Cycle Stores

Cycle parking for each of the apartment buildings is proposed in a series of dedicated secure cycle stores on the ground floor of each of the buildings. This is with the exception of the Clock Tower building on the eastern side of the site which would share the cycle store provided in the apartment building E1 immediately to the north. A total of 384 secure resident cycle parking spaces are proposed for the apartments, with each cycle store containing sufficient parking to provide at least one cycle space per bedroom of the associated apartment building. For the houses secure covered cycle stores are proposed either within parking pergola, or a separate dedicated store adjacent, with three

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

cycle parking spaces provided for each house. A total of 40 visitor cycle parking spaces will be provided. Sufficient cycle parking is proposed, a condition is recommended to secure it.

## vii. Refuse and Services

Refuse/recycling collections and deliveries such as supermarket deliveries, couriers, and food deliveries would be permitted to take place within the site, with vehicle access from College Road. The servicing arrangements on-site would be managed by a management company for the site with appropriate signage in place to guide drivers, conditions are recommended to ensure the correct access is used and other servicing arrangements are satisfactorily managed. Adequate refuse storage is proposed, adequate implementation will be secured by condition.

## viii. Sustainable Transport

A residential travel plan has been submitted, and suitable design measures have been incorporated to encourage sustainable transport, including limiting the car parking spaces proposed. The site also has access to public transport.

## ix. Planning Obligations

Transport Development Management advises that the following obligations are: necessary to make the development acceptable, directly related to the development, and fairly and reasonably related in scale and kind to the development.

- The extent and scope of the S278/ S38
- Contributions of £220 per residential unit for travel plan delivery and management or £5,693 where applicant will do their own delivery

Whilst delegated powers are requested to finalise these planning obligations as part of a s106 Agreement, it is nevertheless important for Members to consider them.

## x. Summary

Subject to conditions and planning obligations being secured, officers (and Transport Development Management) raise no objection to the application with regard transport and highway safety related policies.

**Key Issue H. Sustainability**

The Council's Sustainable City Team raises no objection to the development, concluding that the application complies with all relevant policies. The Team has reviewed the BREEAM Communities Scoping Assessment prepared by Method Consulting; the Energy and Sustainability Statement prepared by Max Fordham; as well responses to the Team's queries from Max Fordham (21.12.22) and Price and Myers (05.01.23).

Policy BCS13 'Climate Change' requires development to take into account the impact of climate change, and specifically requires development to both mitigate and adapt to climate change, and to meet targets to reduce carbon dioxide emissions. Mitigation measures proposed include adopting high standards of energy efficiency, the use of decentralised renewable energy generation, and measures to encourage walking, cycling and the use of public transport. This is evident in the proposal's use of Photovoltaic Panels (PV) on most roofs to provide electricity, Air Source Heat



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Pumps (ASHP), and Ground Source Heat Pumps (GSHP) to provide heat. Back up electric boilers are proposed to provide for peak and back up scenarios, which the Sustainable City Team considers to be acceptable in the context of a site-wide low carbon heat network. The application also includes measures to adapt to climate change, such as measures to minimise the need for active cooling, including: external passive shading, self-shading balcony design, considered glazing specification, and mechanical ventilation with heat recovery (MVHR). This has been evidenced by the submission of overheating risk assessment for homes, which complies with current and future weather files. The proposal is supported by a suitable sustainable urban drainage plans to reduce the risk from surface water flooding as expected by policy BCS16, and extensive green infrastructure is proposed that will minimise and mitigate the heating or the urban environment, including green roofs as well as the landscape proposals.

Policy BCS14 'Sustainable Energy' sets out a requirement for development to minimise its energy requirements and incorporate renewable and low-carbon energy supplies to reduce its carbon dioxide (CO<sub>2</sub>) emissions, expecting the provision of sufficient renewable energy generation to reduce carbon dioxide emissions from residual energy use in the buildings by at least 20%. A total 44% reduction in carbon dioxide emissions beyond Part L 2013 Building Regulations is expected in line with the energy hierarchy, and the proposal will reduce carbon dioxide emissions below residual emissions by 32% through PV alone. Rather than a centralised system, a distributed ASHPs and GSHP site-wide network is proposed to provide heat to low temperature ambient loop systems to the new and refurbished buildings, which provides heating and hot water to dwellings via water source heat pumps. This meets policy BCS14's expectation for new development to demonstrate that the heating and cooling systems have been selected in accordance with the heat hierarchy, as well paragraph 157a of the NPPF. The site is partially within a Heat Priority Area, albeit a connection to an existing district wide system is not available to the development at this time, or in the near future. Representations have challenged the Applicant's use of SAP2012 carbon factors, suggesting that the more recently published SAP10.2 carbon factors and Part L2021 should have been employed. This issue is addressed in the Sustainable City Team's comments, where they advise that as SAP 2012 carbon factors were in use for Part L 2013 at the time of the initial submission, the use of these carbon factors has been continued for the revised statement (rather than Part L 2021), which for the purpose of policy BCS14 calculations they consider to be acceptable.

It is not uncommon for technical guidance to be updated during the consideration of a large-scale planning application and officers consider it is a matter of planning judgment whether the guidance in place at the time the application was submitted should continue to be used or the application should be tested against the more recent guidance. In this instance, officers do not consider that the updated guidance is so significantly different to its predecessor as to make it unreasonable to continue to apply the SAP2012 carbon factors, and it would be disproportionate to require a fresh exercise to be undertaken. This approach is supported by the guidance set out in the Council's Climate Change and Sustainability Practice Note Addendum (CCSPNA) of January 2023, which gives advice on the evidence needed to satisfy Policy BCS14. The CCSPNA notes the replacement of Part L 2013 by Part L2021 in June 2022. In the FAQs in Appendix 1 of the CCSPNA the guidance states *"For schemes currently in planning using the Part L 2013 methodology this will be retained throughout the planning process for the application (including any relevant planning conditions attached). The new methodology will not be applied retrospectively."* The application was submitted in May 2022 and validated in June 2022 (before the new Part L took effect) and was already in the planning process when the CCSPNA was issued in January 2023. Officers therefore consider the approach adopted for the purposes of Policy BCS14 to be acceptable.

Policy BCS15 'Sustainable Design and Construction' expects developments to consider sustainability throughout the design and construction process, from the materials used to the inclusion of measures that enhance biodiversity. Current planning policies do not set explicit targets for reducing embodied carbon, but policy BCS15 does expect sustainable design measures to include reducing waste and recycling during construction and in operation, and consideration of the life cycle of materials to be used. Similarly, paragraph 152 of the NPPF encourages the reuse of existing resources, including the

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

conversion of existing buildings. Paragraphs 135 and 141 of the Government's National Design Guide expects development to reduce embodied energy/carbon, as does the Government's National Model Design Code, which provides guidance on the production of design codes, guides, and policies. Representations have criticised the proposal's design quality, suggesting that the development does not adequately reduce embodied carbon, which is largely due to the proposal demolishing existing buildings, rather than re-using them. There is justification for the demolition of a large proportion of the existing structures at the site, given many of them are enclosures that do not lend themselves re-use for other purposes. One of the exceptions to this is the Conservation Education Centre, which is a modern building proposed to be demolished, this must however be seen in the context of the development converting/re-using approximately nine other existing buildings at the site. Perhaps most relevant to this consideration is the lack of specific targets concerning minimising embodied carbon/energy. The development plan does not include targets for reducing embodied carbon, and nor does the NPPF, or the more recently published National Design Guide and National Model Design Code. The Sustainability Statement outlines the approach to embodied carbon, which includes an aim to reduce upfront embodied carbon and whole life carbon, with further reductions to be explored at detailed design stage. Given the absence of specific targets, officers advise the development suitably addresses the expectations concerning minimising embodied energy/carbon. To refuse or consider the development to be poorly designed along the lines of representations concerning embodied energy/carbon would therefore be unreasonable as the proposal does not fail local design policies and government guidance on design (contained in the National Design Guide and National Model Design Code) in relation to embodied carbon/energy. In accordance with the Sustainability Statement an embodied carbon assessment will be secured by condition.

The development would provide a significant biodiversity net gain for the site, and includes green roofs and a significant landscape scheme (as expected by paragraph 157b of the NPPF). The majority of the residential accommodation will also be flexible, as expected by policy BCS15. The proposal is supported by a BREEAM for Communities Strategy and Scoping Assessment, as is required by policy BCS15 for super major development. No target rating is set in policy for BREEAM Communities for development outside the city centre but development is expected to undertake a scoping assessment and meet the objectives of credits that are relevant to sustainability. The Sustainable City Team supports the BREEAM report, stating that the development meets the principles set out for the relevant credits. The proposal suitably integrates the storage of refuse and recycling, and in accordance with policy BCS15 the Sustainability Statement confirms that new homes should include the provision of high-speed broadband access and enable provision of Next Generation broadband.

The development therefore accords with the key planning policies concerning sustainable construction and design (policies BCS13, BCS14, BCS15, and BCS16) and indeed in some cases the expectations of these policies will be exceeded, such as the reduction in CO2 emissions from residual energy use in the development. The proposal also complies with the sustainable design and climate change measures expected by policies DM27 and DM29 (as per Key Issue D 'Urban Design and Residential Amenity for Future Occupiers'), and policy DM15, save for the incorporation of local food growing opportunities (see Key Issue C 'Green Infrastructure and Landscape Design'). The development complies with paragraph 157 of the NPPF, as it meets the development plan's expectations for decentralised energy generation and suitably takes into account existing landform, layout, building orientation, massing and landscaping to minimise energy consumption. Similarly, in relation to meeting the challenge of climate change, granting permission for this development would be consistent with paragraph 152 of the NPPF, which states that the "...planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change". Specifically, the development's incorporation of sustainable design measures and renewable energy generation will appropriately reduce potential greenhouse gas emissions from the development and the development includes measures to minimise the vulnerability to the effects of climate change. As expected by paragraph 154 of the NPPF, the proposal incorporates suitable adaptation measures and both existing and proposed green infrastructure. Further, the proposal appropriately reduces greenhouse gas emissions, through its design. Representations have suggested the proposal does not comply with the National Design Guide in relation to sustainability,

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

climate change and resilience. Officers disagree. Through compliance with development plan policies, the submission has demonstrated it meets the expectations of the Resources Section of the National Design Guide, as it will suitably mitigate climate change (by reducing greenhouse gas emissions) and adapt to climate change (such as rising temperatures).

In summary, the development complies with the development plan and the Government's relevant policies and guidance concerning sustainability, climate change and resilience, and hence in this regard the development is well designed. Conditions are advised in respect of securing: renewable energy generation, building efficiency, embodied carbon/energy, and broadband.

**Key Issue I. Nature Conservation**

## i. Relevant Planning Policies and Guidance

The Bristol Zoo Gardens Site is located in a semi-urban area adjacent to the Clifton and Durdham Downs Site of Nature Conservation interest (SNCI), though is not considered this proposed development will have a direct impact to this site. The site is not within a wildlife corridor (part of the Bristol Wildlife Network). To the west, separated from the site by houses and the Zoo's former car park is the Avon Gorge SNCI and Site of Special Scientific Interest, adjacent to which is the River Avon SNCI. On the western side of the Gorge is the Avon Gorge Woodlands SAC and the North Somerset and Mendip Bats SAC.

Policy DM19 'Development and Nature Conservation' seeks to minimise developments' impacts on habitats, species or features that contribute to nature conservation in Bristol, where an impact is likely, proposals are expected to:

- i. *Be informed by an appropriate survey and assessment of impacts; and*
- ii. *Be designed and sited, in so far as practicably and viably possible, to avoid any harm to identified habitats, species and features of importance; and*
- iii. *Take opportunities to connect any identified on-site habitats, species or features to nearby corridors in the Wildlife Network.*

The policy expects the loss of nature conservation value to be mitigated on-site, and when not possible, to be provided off-site. Development on or adjacent to sites of nature conservation value will be expected to enhance the site's nature conservation value through the design and placement of any green infrastructure provided.

Paragraphs 174, 179, and 180 of the NPPF are also relevant, in they expect planning decisions to contribute and enhance the natural and local environment, including avoiding harm to designated sites and achieving net gains for biodiversity.

## ii. Impact on the site's ecological features

The Nature Conservation Officer's comments confirm that the Ecological Appraisal (EA) (The Landmark Practice, October 2022) sufficiently addresses the ecological features of the site by providing the results of extensive surveys, and outlines appropriate protection, enhancement, and mitigation measures required for this proposed development.

The proposed scheme will likely disturb, damage or destroy up to 14-day bat roosts. All roosts identified are summer day roosts used by common species in low numbers. In accordance with the

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Natural England's advice (Bats: advice for making planning decisions), before planning permission can be granted, the local authority must:

- *make sure any mitigation or compensation conditions you impose do not conflict with the requirements of a bat mitigation licence, and*
- *be confident that Natural England will issue a licence*

Further, by law (the Conservation of Habitats and Species Regulations 2017) the LPA must apply the three derogation tests to comply with the legal protection afforded to European protected species. Effectively, these three tests relate to the two bullet points above, as if these tests cannot be met the LPA will not be able to 'be confident that Natural England will issue a licence'.

1. There is "no satisfactory alternative"

The Background Section within this report sets out that the Zoo has closed and considers the reasons for the Zoo's closure to be reasonable. Further, it explains that the Council is not aware of any interest being expressed by other zoo operators to use the site, nor of any other re-use proposals that would not entail redevelopment. Hence, it is necessary to consider the redevelopment of the site. To 'do nothing' is not a satisfactory alternative, as a form of redevelopment is required to prevent the gardens and historic buildings being vacant and potentially falling into disrepair. Similarly, if buildings and structures were not occupied or managed through 'doing nothing', eventually the bat roosts within the structures would be lost.

The submission explains that the 14 roosts are summer day roosts used by a small number of individual bats. Where roosts are located in such buildings, proposals aim to retain roosts in-situ. However, some of the roosts were found under fascia boards or bargeboards of animal enclosures, food vending buildings and outdated office buildings, which are not suitable for conversion into residential properties or for public use so there is no alternative other than for these roosts to be lost.

This test has been passed by the development.

2. The proposal would "not be detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range"

This test has been met by the outline mitigation strategy and method statement (MSMS), which is included in the EA, and provides a suitable ecological mitigation scheme for the impacted bat roosts. The Nature Conservation Officer has suggested a number of conditions regarding works affecting bats and/or their roosts, including securing full details of the mitigation scheme in accordance with the MSMS, these conditions do not conflict with the requirements of a bat mitigation licence.

3. The proposal is "in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment"

The redevelopment of the site will deliver public benefits that clearly outweigh the public interest benefits associated with retaining the impacted bat roosts.

With regard to the key environmental benefits, the development assures the long-term conservation of all the designated and non-designated heritage assets within the site, and better reveals the significance of a number of the listed buildings by removing more recent or modern accretions, representing a further heritage-benefit of the application. The proposed landscaping scheme ensures that most of the listed buildings are within publicly accessible areas, which together with the free

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

public access to the site, means people visiting the site will have the opportunity to gain a better appreciation of these historic structures. The development will also result in a net gain for biodiversity, and meets the expectations of sustainability policies, including locating a mixed-use, residential-led development in proximity of designated centres.

The development will help to address the well-established unmet need for homes, including affordable homes, within the city. A further social benefit is the free public access to the site's high quality open spaces provided by the development, including the children's play areas, which will help support the communities' health, social and cultural well-being. The Public Art and Cultural Strategy provides a tangible vision for how the redevelopment of the site can continue to be culturally relevant to Bristol, representing a social benefit. Finally, the proposed Clifton Conservation Hub includes dedicated community floorspace, as well as a café, which will provide a social benefit to the local community.

Economic benefits would also flow from the development, including spending by future residents in the local economy, employment generated by the development, and the more short term economic benefits associated with the construction phase.

Whilst the scheme has many public benefits (a comprehensive list of the development's public benefits is provided within Key Issue B vi), the long-term conservation of all the heritage assets at the site, free public access to the proposed open spaces, and housing provision represents imperative reasons of overriding public interest. Accordingly, this test has been met.

The Nature Conservation Officer has concluded that it is anticipated that Natural England will grant a licence, further Natural England raise no objection to the proposal. The proposal's impact on bats is therefore considered acceptable and in keeping with national legislation and guidance, and policy DM19.

The proposal will impact habitats, species, and features that contribute to nature conservation at the site. Where impacts are predicted, suitable avoidance, mitigation or compensation measures have been proposed to ensure the conservation status of protected species are maintained. The proposed development can proceed without resulting in significant negative impacts on biodiversity and compliance with policy DM19, as well as legislation for the conservation of the natural environment. Extensive mitigation, compensation and enhancement measures are proposed within section 7.4 of the EA, conditions are recommended to secure them where appropriate.

### iii. Habitats Regulations

As per Natural England's initial comments, the proposal has the potential to have significant effects on the Avon Gorge Woodlands SAC and the North Somerset and Mendip Bats SAC, given the scale and nature of the development and that the site is within the relevant consultation zones. The Applicant has provided a Shadow Habitats Regulations Assessment (HRA) to address these concerns, which in addition to considering the proposal's impact on the aforementioned SACs, also considers the proposal's impact on the Severn Estuary SPA/SAC/Ramsar and the Avon Gorge SSSI.

The Shadow HRA considers the likely significant effects of the proposed development on National Site Network Sites (those identified above and also referred to as 'habitats sites' within the NPPF) within 10 kilometres (stage one screening) and Appropriate Assessment (AA) of the implications for the development on those protected sites, in view of their respective conservation objectives. The Shadow HRA concluded that no likely significant effects are anticipated via noise, visual or hydrological/drainage to the Severn Estuary European Marine Sites, and no likely significant effects are anticipated on the qualifying features of the North Somerset and Mendip Bats SAC. In the

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

absence of mitigation, the proposed development has the potential to result in likely significant effects upon the Avon Gorge Woodlands SAC as a result of potential air quality impacts from increased dust generated from the movement of lorries to and from the proposed development site, known as “track-out routes” during the construction phase. The submitted Air Quality Assessment produced for this development concludes that: *“Overall, the Proposed Development is considered to be Medium Risk for nuisance dust soiling effects, Low Risk for PM10 health effects and to be Medium Risk for ecological impacts, in the absence of mitigation”*.

The AA considers whether a plan or project could result in an adverse effect on integrity of one or more National Site Network sites/habitat areas, either alone or in combination with other projects. Mitigation measures to reduce the risk of impacts to the Avon Gorge SAC during construction are outlined in appendix A of the Air Quality Assessment (Hydrock Consultants Limited, 2022) and are recommended to be conditioned within a Construction Environmental Management Plan. With the specified mitigation in place to protect the Avon Gorge SAC, there would be no anticipated adverse effect on integrity on a National Site Network site within 10 kilometres of the proposed development and the AA concludes that there is unlikely to be an adverse effect on integrity to the Avon Gorge Woodlands SAC from in-combination effects between the proposed development and other large-scale proposed developments in the surrounding area.

As the competent authority, the LPA has consulted Natural England for the purposes of the assessment and has had regard to their representations. Natural England has confirmed the mitigation measures outlined in the Shadow HRA are sufficient in respect of construction vehicle dust resulting from the construction phase. They also suggested that increased recreational pressure on the Avon Gorge SAC could result from this development, but the proposal includes sufficient onsite greenspace to adequately mitigate additional recreational pressure resulting from the development. The residential proposals are functionally and physically linked with the open space proposed, hence the mitigation they provide will be secured in perpetuity. As per the submitted Shadow HRA, Natural England considered the proposal’s impacts both alone and in combination with other developments, including the planning permission at the West Car Park, concluding that they do not consider that the proposed development would result in an adverse effect on the integrity of the SAC. Natural England also agreed with the conclusions of the Shadow HRA regarding the North Somerset and Mendip Bats SAC and the Severn Estuary SPA/SAC/Ramsar.

The submitted Shadow HRA provides sufficient evidence to rule out potential adverse effects from the development on the integrity of the habitats site, and as such, and in accordance with advice from Natural England and the Nature Conservation Officer, the local authority as the competent authority raises no objection to the proposal’s impact on habitat sites, subject to a condition securing mitigation measures required during construction to protect the Avon Gorge SAC outlined in the Air Quality Assessment, via the Shadow HRA. The submitted Shadow HRA/AA is adopted by the local authority. Officers advise that the local authority has appropriately discharged its duty in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended).

Following the submission of the amended Shadow HRA, which considered additional planned development in the locality, namely the planning permission at the West Car Park, Natural England advised that the overall planned development in the area would result in more pressure on local services including local greenspace, which “...may justify a more significant contribution to management of greenspaces in the vicinity but outside of the red line boundary”. Natural England thereafter confirmed that those comments “...were made in reference to increased pressure on

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

greenspaces in the vicinity of the development generally rather than specifically about the Avon Gorge and Woodlands SAC”.

Officers have considered if a financial contribution to the management of local greenspaces is required to mitigate any potentially harmful impact this development could have on the ecological value of those greenspaces, both in isolation as well as in combination with others. Firstly, it has not been demonstrated that the development individually, or in combination with others, would result in an adverse impact to the ecological value of nearby greenspaces. Secondly, the proposal itself includes significant open spaces that will provide for future residents of the development as well as existing and planned residential development in the area. For example, the submitted Open Space Assessment demonstrates that the open space delivered on site by the development meets the requirements of policy DM16 and Appendix 2's (of the SADMP) locality quantity standard. Further, the functional public open space provided by the development, would still exceed the overall locality quantity standard if considering the expected population yields of both the proposed development and the approved development at the West Car Park. Further, the Planning Obligations SPD suggests that in the main, improvements to public open spaces will be funded by Community Infrastructure Levy, rather than planning obligations. As such, there is insufficient justification to require the development to contribute to or facilitate the management of nearby greenspaces, as it is not necessary to make the development acceptable in planning terms. Accordingly, the financial contribution to support the management of local greenspaces would not meet the tests set out in paragraph 57 of the NPPF and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.

iv. Biodiversity net gain assessment

The Bristol Tree Forum suggests the provided Biodiversity Net Gain Assessment is not reliable as it: does not use the correct metric (they originally suggested 3.1, rather than 3.0); there are errors relating to the baseline and urban tree habitats specifically relating to the use of metric 3.0 rather than 3.1; incorrect assumptions made about the maturity of the trees; the site has medium strategic importance, rather than low; and the calculation does not account for delay in creating new habitat. As such, the Bristol Tree Forum suggested in their original comments that a net loss to biodiversity of 22% would occur as a result of the development. These concerns were then addressed by the Applicant's ecologist (The Landmark Practice) within a note dated 24.10.22. In response to each issue raised by the Bristol Tree Forum with the submitted Biodiversity Net Gain Assessment, the Landmark Practice's note addresses each concern, demonstrating that the Biodiversity Net Gain Assessment is suitably robust and in accordance with the relevant guidance. Meeting notes and emails have been submitted by the Bristol Tree Forum following the publication of the Landmark Practice's note, suggesting they still contest the submitted Biodiversity Net Gain Assessment along the same lines as summarised above. Whilst a simplification, the crux of the Bristol Tree Forum's criticism concerns the use of Natural England's Biodiversity Metric 3.0, rather than 3.1 which they suggest is better suited to considering urban trees. Officers have challenged the Applicant on this basis, their response is that the Natural England does not recommend changing metrics mid-project, as this may result in discrepancies between calculations. This is the case for this development, as the planning and preparatory work for this planning application commenced prior to the Biodiversity Metric 3.1 being published, as is explained within paragraphs 3.13-3.15 of the submitted Biodiversity Net Gain Report (Landmark Practice, October 2022).

The Bristol Tree Forum also challenges the Applicant's classification of the site for the purposes of the net gain assessment, where the submitted assessment considers the site to have 'low strategic significance', rather than 'medium strategic significance'. In response, the Applicant's Ecologist has

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

referenced Natural England's guidance for assigning significance as part of Metric 3.0, which highlights that strategic significance should be considered separately for each individual habitat, rather than at a site-wide level as argued by the Bristol Tree Forum. Further, the Applicant's Ecologist identifies that the site is not covered by a relevant strategy or policy that would indicate a higher level of significance. Specifically, the site is not designated for its ecological importance, is not part of local nature or biodiversity plan, and is not part of the Strategic Green Infrastructure Network (as identified within Diagram 4.9.1 of the Core Strategy). Whilst the site is adjacent to an SNCI, the Applicant's Ecologist advises that the site "... is surrounded on three sides by built development and is separated from the SNCI by both the large external wall of the Zoo Gardens and a busy urban road, and therefore its individual habitats do not lie in a strategic location (i.e., one that could improve connectivity between SNCI habitats and those nearby)". (para 11, Ecology Response To Consultee Comments). Natural England's guidance states that "*Medium strategic significance can be used where professional judgement is applied and the location is deemed ecologically desirable for a particular habitat type, whether recorded in the site baseline*" (para 5.19, Metric 3.0). In this way it is a matter of professional judgement whether a habitat should be considered as low or medium strategic significance. The Applicant's Ecologist has suitably addressed the Bristol Tree Forum's case in this regard, providing compelling justification with reference to the relevant guidance. Similarly, the Council's Nature Conservation Officer agrees with the strategic significance assigned to habitat within the Applicant's assessment.

In the Bristol Tree Forum's latest comments (March 2023) they reiterate many of their previously stated concerns, including that the development will not achieve a biodiversity net gain, the majority of these concerns are adequately addressed above. However, they also suggest Natural England's latest Metric should be used, which is Metric 4.0 and was published in March 2023. As with Metric 3.1, officers advise it would be unreasonable to require the Applicant to change metrics at this late stage of a planning application for the reasons discussed above. In addition, although Metric 4.0 is substantially updated compared to Metric 3.1, Natural England advises that this is more to do with matters of data presentation than it is to do with the underlying results. In its 'Summary of Changes – The Biodiversity Metric Version 3.1 to 4.0', Natural England advises at paragraph 1.1.1 that "*The Biodiversity Metric 4.0 is a substantial update to previous versions of the metric. However, the majority of changes are focused on providing an enhanced user experience and are unlikely to have significant impact on the range of outputs generated.*" Similarly, when Metric 3.1 was introduced the accompanying guidance in Natural England's 'Summary of Changes from Biodiversity Metric 3.0 to Version 3.1' had stated (in its opening summary) "*Metric 3.1 represents a relatively small-scale change from version 3.0, primarily focusing on clarifications to guidance and revisions to the condition assessments. Except for a very small number of select habitats, the metric 3.1 update is unlikely to have a significant impact on the range of overall outputs generated.*" Officers consider that in the circumstances it would be disproportionate to require the BNG calculation to be re-assessed using the more recent Metric 4.0. Further, in their latest comments the Bristol Tree Forum suggest that if Metric 4.0 is not adopted, it should at least be adopted for individual urban trees. As has been discussed, metrics should not be used interchangeably, and this is made clear at Table 3-1 of Natural England's 'The Biodiversity Metric 4.0 User Guide', at Rule 2, where it advises that "*Biodiversity unit outputs are unique to this metric. The results of other metrics, including previous versions of this metric, are not comparable to those of this metric.*"

The Nature Conservation Officer raises no objection to the Biodiversity Net Gain Report (October 2022), which advises that the development will achieve a 39.86% gain in habitat units and 376.35% gain in hedgerow units will be achieved through the proposed landscaping scheme. The proposed urban trees within the Biodiversity Net Gain metric represent half of the proposed urban trees on site,



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

assuming that only half of all proposed trees will reach full maturity to factor in the various risks to the longevity of trees within the site, including those within private gardens. For transparency the Applicant agreed that the Biodiversity Net Gain metric was re-run, removing retained and proposed trees in private gardens as their maintenance to desired condition cannot be guaranteed for 30-years (as required by the Environment Act 2021, schedule 7A, Part 1, paragraph 9). The Applicant provided re-run Biodiversity Net Gain calculations removing these trees which resulted in a drop from 39.86% to 36% gain in habitat units. The Nature Conservation Officer accepts the cautionary approach to inputting urban tree habitat into the Biodiversity Net Gain metric and acknowledges the minor reduction in the Biodiversity Net Gain calculation. The expected biodiversity net gain is significant, going far beyond any expectation included within the NPPF. The proposal's net gain for biodiversity attracts positive weight in the planning balance.

## v. Summary

Whilst the proposal will impact habitats, species, and features that contribute to nature conservation at the site, suitable avoidance, mitigation and compensation measures have been proposed to ensure the conservation status of protected species are maintained. The submitted Shadow HRA provides sufficient evidence to rule out potential adverse effects from the development on the integrity of the habitats site. Finally, the submission indicates a net gain for biodiversity, which attracts positive weight in the planning balance.

**Key Issue J. Other Matters**

- i. Land Contamination – in accordance with the Public Protection Team's (Land Contamination) comments, standard conditions requiring initial contamination investigations and any necessary remediation works together with subsequent verification, and unexploded ordnance are advised.
- ii. Health Impact Assessment – in accordance with policy DM14 a health impact assessment has been provided as the proposal delivers in excess of 100 new homes. The submitted Health Impact Assessment thoroughly considers the development's impact on health, including reducing the causes of ill health, improving health and reducing health inequalities within the city. Officers agree with its conclusions, and do not recommend that any adverse health-related impacts of the development are so significant they need to be mitigated. The proposals meets the expectations of policy DM14.
- iii. Employment skills plan – the Building Bristol (Employment Skills) Team has reviewed the submitted an Employment Skills Plan and finds it acceptable. Given the Applicant is unlikely to be the developer, a condition is recommended to ensure the final employment skills plan relates to the construction-phase. The Council will need to monitor the implementation of the approved employment and skills plan, the cost of which should be met by the developer. This cost is considered to be £2,000, officers recommend that the s106 Agreement secures the payment of this amount to the Council from the developer.
- iv. Fire hydrants – in accordance with Avon Fire and Rescue's comments, nine fire hydrants would be required to ensure that in the case of a fire, firefighters would have adequate access to installed and appropriate-sized water mains. This additional infrastructure is required as a direct result of the developments and so the costs will need to be borne by developer. As such, officers recommend that the s106 Agreement requires the Applicant to meet the costs of installing the required fire hydrants. Avon Fire and Rescue has also indicated potential hydrant locations, all of which are compatible with the proposal and existing green infrastructure.
- v. Air Quality – the Air Quality Team has revised the submitted Air Quality Assessment, accepting its findings and raising no objection in respect of the proposal's air quality impact.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- vi. Sustainable urban drainage – the Lead Local Flood Authority has confirmed that the submitted sustainable urban drainage is acceptable, albeit a condition is recommended to require full details of the drainage system. Such a condition will also allow the outstanding minor details to be addressed, including the diameter of some pipes and maintenance.

**Key Issue K. Planning Obligations**

Planning obligations must accord with section 122 of the Community Infrastructure Levy Regulations 2010 and paragraphs 55 and 57 of the NPPF, in that a planning obligation may only constitute a reason for granting planning permission for a development if the obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Officers advise that the planning obligations listed below meet the requirements of these tests.

- i. Free Public Access – public access shall be afforded in perpetuity to the areas of the site identified for public access on Page 66 of the DAS (or a standalone plan 11585-LD-SKE-23022 A), at no expense to members of the public in perpetuity, between 8am-7pm (June – September) and 8am-5pm for the remainder of the year.
- ii. Management of Public Areas - the maintenance of the areas of the site identified for public access on Page 66 of the DAS (or a standalone plan 11585-LD-SKE-23022 A), shall be the responsibility of the Management Board in accordance with the Management Plan. The Detailed Management Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby approved, and shall be in accordance with the structure and responsibilities outlined in Chapters 4, 5, and 6 of the approved Management Plan (authored by Savills). The structure of the Management Board, its responsibilities and commitments shall be defined by a Detailed Management Plan.
- iii. Affordable housing contribution – in accordance with the Affordable Housing Practice Note (July 2022), the Owner commits to naming a minimum policy compliant provision of 20% affordable homes.
- iv. Fire Hydrants - the contribution in the sum of thirteen thousand five hundred pounds (£13,500.00) Index Linked payable to the Council by the Owner prior to the first occupation of development. This is to pay for the installation of a 9no. fire hydrants as per Avon Fire and Rescue's comments.
- v. Employment Skills - the sum of two thousand pounds (£2,000.00) Index Linked to be used by the Council towards the Council's costs and expenses incurred by the Council in monitoring the implementation of the Employment and Skills Plan.
- vi. Travel Plan - the contribution in the sum of five thousand six hundred and ninety three pounds (£5,693) Index Linked payable to the Council by the Owner prior to the commencement of development for the Council to undertake monitoring and auditing; or the contribution in the sum of four thousand one hundred and twenty pounds (£43,120) Index Linked payable to the Council by the Owner prior to the commencement of development for the Council to undertake the implementation of the Travel Plan on the Owner's behalf
- vii. Highway Works – the extent and scope of the s278 Agreement (under the Highway Act 1980) to ensure it will address the area within the highway surrounding the site, up to the back of footways on the opposite side of the respective roads to the site, including Northcote Road, Guthrie Road,

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

and College Road. The extent and scope of the s38 works under the Highway Act 1980 shall also be secured.

The development is liable to pay Community Infrastructure Levy (CIL): The CIL liability for this development is £1,520,875.14, however social housing relief may be claimed on those residential dwellings included in the development that are to be managed by a Housing Association for the provision of affordable housing.

**Key Issue L. Planning Balance and Conclusion**

This Key Issue provides a summary of all the key issues culminating in a recommendation following the planning balance. In doing so, this section explains how the Council has complied with all relevant statutory duties in making the recommendation.

**i. Statutory Duties on Heritage**

The development affects a number of listed buildings directly through proposing works to their built fabric, and indirectly through proposing development within the setting of listed buildings. Further, the development impacts the setting of two Conservation Areas. Key Issue B 'Heritage Assessment' assesses the impacts of the development on the identified heritage assets, concluding that whilst the proposal will harmfully impact them, there is clear and convincing justification for the harm, and the public benefits associated with approving the development are so significant they outweigh the identified harm. In this circumstance, officers consider this to be an exceptional case, where the presumption against planning permission being granted has been overridden in favour of the development which is desirable on the ground of the discussed public benefits. In reaching this conclusion, both the desirability of conserving heritage assets unharmed and the identified harm to the listed buildings and conservation areas was allocated considerable importance and weight, thereby discharging the statutory duty imposed by section 66 and section 72 of Planning (Listed Buildings and Conservation Areas) Act 1990.

**ii. Statutory Duties on Biodiversity**

Key Issue I 'Nature Conservation' considers the planning application in respect of its impact on nature conservation, concluding that it would appropriately conserve and enhance biodiversity, discharging the Council's statutory biodiversity duty, as required by the Natural Environment and Rural Communities Act 2006 (as amended by the Environment Act 2021). Further, as the competent authority, the Council has adopted the submitted Shadow HRA, which provides sufficient evidence to rule out potential adverse effects from the development on the integrity of habitats sites, thereby appropriately discharging the requirements of the Conservation of Habitats and Species Regulations 2017. Finally, in accordance with the Conservation of Habitats and Species Regulations 2017, Key Issue I evidences that the proposal passes the three derogation tests to comply with the legal protection afforded to European protected species.

**iii. Public Sector Equality Duty**

The 'Equality Assessment' section of this report considers the implications of granting planning permission in relation to the Public Sector Equality Duty in terms of its impact upon the groups with protected characteristics as set out in the Equality Act 2010. The approval of this application would not have any adverse impact upon any protected group, save for the development not including step-free access to the raised viewing platform within the Bear Pit, albeit the great weight given to the conservation of the Grade II listed building outweighs the failure of the development to allow access to

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

the viewing platform for all. Accordingly, in assessing this planning application and reaching its recommendation, the LPA has had due regard to the Public Sector Equality Duty contained in section 149(1) of the Equality Act 2010 and has therefore discharged this statutory duty.

iv. Does the Planning Application accord with the Development plan?

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70 (2) of the Town and Country Planning Act 1990 requires and provides that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. Accordingly, the first step is to consider if the development accords with the development plan when taken as a whole, and the second step is to consider if there are any material considerations that indicate that the application should not be determined in accordance with the development plan.

The site is designated as Important Open Space. Policies BCS9 seeks to protect open spaces and policy DM17 resists the development of Important Open Space unless it is ancillary to the open space use. As these policies refer to the principle of how the site should be used, they are some of the most important policies for determining the application. Key Issue A i 'Important Open Space' advises that whilst many aspects of the development comply with policies BCS9 and DM17, the residential proposals are contrary to policies BCS9 and DM17, largely as they are not ancillary to the open space use.

Of similar importance are policies BCS12 and DM5, which in short both seek to retain existing community facilities, unless certain circumstances are met. Whilst not the primary focus of the Zoo, it did provide community facilities, meaning policies BCS12 and DM5 apply. Key Issue A ii 'Loss of a Community Use' concluded that the proposal complied with these policies, as the zoo use is re-provided for at the Wild Place Project, and other more local community aspects associated with the zoo use would be re-provided at the site, for example by the open space, events venue, and meeting place for the community.

In terms of the proposed uses, whilst the proposed residential element of the development does not comply with policies BCS9 and DM17, Key Issue A iv 'Residential Development' concludes that the development accords with policy BCS5, which addresses the level of new homes to be developed in Bristol between 2006 and 2026. Further, the proposed Community Floorspace complies with policies BCS7 and DM7 confirming the principle of the use is acceptable in principle.

Key Issue B 'Heritage Assessment' advises that the development fails to meet policies BCS22, DM26 and DM31, as the development poses a less than substantial level of harm to multiple heritage assets including: Grade II listed buildings, two Conservation Areas, and various locally listed/non-designated heritage assets. The site is a locally designated historic park and garden and hosts designated and non-designated heritage assets, as well as being with the setting of numerous designated and non-designated heritage assets. As such, these heritage-related policies are within the basket of most important policies for determining the application.

Key Issue C 'Green Infrastructure and Landscape Design' considered the proposal's impact on existing green infrastructure and quality of landscape design. Whilst the proposal will result in a significant number of trees being felled, this loss is considered to be compliant with policies BCS9 and DM17 and is appropriately mitigated. Further, sufficient tree protection measures have been provided for this stage, with final measures recommended to be secured by condition. The application includes a high quality landscape design that is accompanied by robust servicing and management proposals, compliant with policies DM16 and DM27. Whilst the proposal generally complies with the provisions policy DM15, it includes no specific proposals for local food growing as required by this policy, meaning development does not accord with the policy, albeit the extent of the breach is limited.

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Whilst the development includes many aspects of high quality urban design expected by the development plan, Key Issue D 'Urban Design and Residential Amenity for Future Occupiers' reports that the proposal's design is contrary to policies DM26, DM27, and BCS21, due to its scale and massing failing to be appropriately informed by the local context. Other aspects of the proposals evidence an acceptable quality of urban design, consistent with policies DM28, DM29, and DM30.

Key Issue E 'Impact on Neighbouring Properties' acknowledged that the development will impact neighbour's amenity, sometimes negatively, but concludes that the impact is not unacceptable and complies with relevant expectations contained within policies BCS20, BCS21, DM27 and DM29.

Key Issue F 'Mixed and Balanced Communities (Including Affordable Housing)' advises that the proposal meets the expectations of policy BCS18 through appropriately maintaining and contributing to the mix of housing tenures, types and sizes to help support the creation of mixed, balanced, and inclusive communities. The proposal's also offers an acceptable quantity (20%) of affordable housing, which whilst does not comply with the 40% expectation included within policy BCS17, does comply with expectations of the AHPN, where the benefit of achieving early delivery of the development and its affordable housing is treated as a material consideration which outweighs the need for compliance with the full requirements of the policy BCS17.

Subject to conditions and planning obligations discussed within Key Issue G 'Highway Safety and Transportation', the proposal is considered to be acceptable with regard to transport and highway safety, and is compliant with relevant policies (BCS10 and DM23).

Key Issue H 'Sustainability' concludes that the proposal accords with the key planning policies concerning sustainable construction and design (policies BCS13, BCS14, BCS15, and BCS16) and indeed in some cases the expectations of these policies will be exceeded, such as the reduction in CO2 emissions from residual energy use in the development.

Key Issue I 'Nature Conservation' indicates that the proposal will impact habitats, species, and features that contribute to nature conservation at the site, however in accordance with policy DM19 suitable avoidance, mitigation and compensation measures have been proposed to ensure the conservation status of protected species are maintained – these can be secured by condition. Further, the proposal will enhance the site's nature conservation value, through achieving a net gain for biodiversity.

A thorough review of the development plans policies relevant to this application indicates that the application is not in accordance with the development plan when taken as a whole, as it conflicts with multiple policies as discussed above, including some of those that are most important to the determination of this application, namely: BCS9, BCS17, BCS21, BSC22, DM17, DM26, DM27, and DM31. Because the Council cannot demonstrate a 5 year housing land supply and has failed the most recent Housing Delivery Test, these and other most important policies (such as Policy BCS5) are deemed to be out-of-date but this does not mean that the policies should not carry considerable weight. Weight is a separate question to whether policies are out of date (or are deemed to be out of date) and is a matter for planning judgment. In officers' views all of the policy conflicts relate to matters of legitimate planning concern (for the reasons explained above) and so considerable weight should be given to the non-compliance with the development plan.

v. Other Material Considerations

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

In reaching a recommendation it is necessary to consider if there are any material considerations that act to outweigh the identified conflict with the development plan, and hence indicate that a decision other than in accordance with the development plan should be reached. The NPPF represents a key material consideration in this regard, and hence should be considered in the planning balance.

Key Issue A i 'Important Open Space' concludes that the proposal meets the NPPF's expectations regarding open space, as the development will result in marked qualitative enhancement in the nature of the open space provision available at the site, in accordance with paragraph 99b of the NPPF. Free public access to the open spaces proposed will be secured by section 106 Agreement. Key Issue A ii 'Loss of Community Use' assesses the proposal's impact on the provision of community facilities and concludes that the proposal complies with paragraph 93 of the NPPF, which concerns the provision of social, recreational and cultural facilities, including how they serve the community. As discussed in Key Issue A iii 'Community Floorspace', the proposal also delivers community floorspace in accordance with paragraph 92a of the NPPF, and generally the proposal will deliver a healthy, inclusive and safe place, as expected by paragraph 92.

The development would deliver free public access to the proposed high quality open space, which will help support the communities' health, social and cultural well-being, which represent a substantial social benefit to the public, compliant with Section 8 of the NPPF. The proposed Clifton Conservation Hub includes dedicated community floorspace, as well as a café, which will provide a social benefit to the local community that will be secured as part of planning permission.

In accordance with paragraph 120d of the NPPF, Key Issue A vii highlights that the proposal would represent an effective use of a currently under-utilised site, which would help to meet identified needs for housing in Bristol, where land supply is constrained. Indeed, the proposal would help to address the Council's lack of a five year housing land supply, which is currently 2.45 years (as identified at for the purposes of a recent Appeal at Brislington Meadows). Further, in accordance with paragraph 69c of the NPPF, the approval of this development would help deliver a windfall site, which will help to promote the development of a good mix of sites in Bristol. There is also a commitment to early delivery which will be secured by section 106 Agreement as part of the arrangements for affordable housing. Key Issue E 'Mix and Balance of Communities (Including Affordable Housing) explains that the development includes an appropriate mix of homes to provide for different groups in the community, including the provision of affordable housing (20% of the homes proposed will be secured as affordable housing by section 106 Agreement if there is early delivery and a viability review if there is not), consistent with expectations of Section 5 of the NPPF.

Substantial weight should be attributed to the social benefit that would result from the proposal's significant housing contribution, especially in the context of the current shortfall of housing land supply. Similarly, substantial weight should be allocated to the proposal's affordable housing offer, which will be secured by section 106 agreement.

The proposal will result in less than substantial harm to multiple heritage assets, as are identified in Key Issue B 'Heritage Assessment'. The harm predominantly results from the following aspects of the proposal: the change of use resulting in the loss of the existing, albeit ceased, zoological use; and the quantity of residential development in relation to both its location within the more central areas, and its scale and massing at the perimeter of the site. Whilst the proposal does harm the significance of heritage assets contrary to the general thrust of Section 16 of the NPPF, clear and convincing justification has been provided in accordance with paragraph 200 of the NPPF, and the public benefits associated with approving the development are advised to be so significant they outweigh the identified harm in accordance with paragraph 202 of the NPPF. The application of the NPPF therefore does not suggest that the application should be refused on heritage grounds.

The proposal will also result in heritage-related benefits, most notably by ensuring the long-term conservation of all the designated and non-designated heritage assets within the site, and will better

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

reveal the significance of a number of the site's listed buildings by removing more recent or modern accretions. Further, the free public access to the site and incorporation of many of the listed buildings within the accessible areas will also provide the public with the opportunity to gain a better appreciation of the historic structure. These represent environmental benefits of the development that weigh in its favour.

Key Issue C 'Green Infrastructure and Landscape Design' concludes that the development complies with paragraphs 130 and 131 of the NPPF, as it appropriately recognises the importance of trees, incorporating existing and new trees into the development as part of an effective landscape proposal, which will be secured in the long-term. Further, the proposal will not result in the loss or deterioration of the site's veteran tree, as required by paragraph 180c of the NPPF.

As discussed in Key Issue C, the proposal includes a Management Plan that provides an appropriate framework to suitably manage the site in future, which is recommended to be secured by section 106 agreement. This represents an environmental benefit of the development.

Whilst many aspects of the proposal's design conform to the expectations of the NPPF, Key Issue D 'Urban Design and Residential Amenity for Future Occupiers' identifies that the proposal's scale and mass fail to suitably respond to the area's prevailing character, meaning the proposal does not comply with all of the NPPF's expectations, including paragraphs 124d and 130c. The development is generally well-designed as expected by the NPPF, however the proposal's scale and massing means that on balance, the development cannot be considered to be 'well designed' in the context of paragraph 134, which suggests the development should be refused. This weighs against the development and should be considered when taking the NPPF as whole.

Key Issue G 'Highway Safety and Transportation' assesses the development's impacts and subject to relevant conditions and planning obligations, the development is considered to comply with paragraphs 110, 112 and 113 of the NPPF. Importantly, the development is not expected to result in an unacceptable impact on highway safety, and the residual cumulative impacts of the proposal on the road network would not be severe, meaning paragraph 111 of the NPPF does not apply.

Key Issue H 'Sustainability' concludes that the proposal is consistent with paragraphs 152, 154, and 157 of the NPPF, appropriately meeting the challenge of climate change as per the expectations of Section 14 of the NPPF.

The proposal will not result in significant harm to biodiversity, rather it would facilitate a net gain for biodiversity in accordance with paragraphs 174 and 180 of the NPPF. Further, the proposal would not adversely affect habitat sites, and in accordance with paragraph 182 an appropriate assessment has concluded that proposal will not adversely affect the integrity of the identified habitats site. As the assessment in Key Issue I 'Sustainability' explains, generally the development will appropriately protect and enhance biodiversity, in accordance with Section 15 of the NPPF.

vi. The Planning Balance

The adverse impacts of the development relate to open space, heritage, and urban design. Whilst many aspects of the development comply with policies BCS9 and DM17, such as the provision of free public access to high quality open space, the residential proposals are contrary to policies BCS9 and DM17, largely as they are not ancillary to the open space use. The application does however comply with paragraph 99b of the NPPF, which sets out the NPPF's expectations for open space. The development fails to meet policies BCS22, DM26 and DM31, as the development poses a less than substantial level of harm to multiple heritage assets, albeit the application of relevant NPPF policies does not suggest the application should be refused because of heritage-related harm. The proposal's quality of urban design is contrary to policies DM26, DM27, and BCS21, as well the corresponding

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

sections of the NPPF. These inconsistencies with the development plan represent adverse impacts of the development, as do the more limited contraventions of the NPPF.

The benefits of the development are set out in full in Key Issue B vi, but principally concern the provision of free public access to the proposed high quality open spaces at the site, including a framework to ensure the long-term management of these open spaces; the delivery of 196 high quality homes, 40no. of which would be affordable; and heritage-related benefits including ensuring the long-term conservation of all the heritage assets within the site.

As reported in Key Issue A iv 'Residential Development', the Council cannot demonstrate a five year supply of deliverable housing sites and has failed the recent Housing Delivery Test, meaning paragraph 11d of the NPPF is engaged. Taking paragraph 11d.i first, Key Issues B and I of this report indicates that, subject to appropriate conditions and the securing of benefits in a s.106 agreement, the proposal conforms with the relevant policies in the NPPF concerning designated heritage assets or habitat sites (as listed in paragraph 181), meaning these NPPF policies do not provide a clear reason for refusing the development. It is therefore necessary to consider if paragraph 11d.ii is satisfied. This indicates that the planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole (11d.ii).

In accordance with paragraph 11d.ii of the NPPF, officers have considered the policies in the NPPF taken as a whole, considering those that weigh against the development as well as those that weigh in favour of it. The development will result in adverse impacts, most notably in respect of heritage and urban design, including non-conformity with the development plan. However, when assessed against the policies in the NPPF taken as whole, the substantial weight associated with the proposal's adverse impacts fails to significantly and demonstrably outweigh the benefits of granting permission. Paragraph 11d.ii is therefore not satisfied, meaning the presumption in favour of sustainable development applies and represents a key material consideration in the planning balance required by section 38(6) of the Planning and Compulsory Purchase Act 2004.

Taking the policies of the development plan as a whole, overall, it is concluded that the proposal is not in accordance with the Development plan but that, on balance, there are sufficient material considerations to indicate that a decision otherwise than in accordance with the development plan is warranted. Specifically, the benefits of the development and the established presumption in favour of sustainable development (paragraph 11 of the NPPF) attracts such significant weight they outweigh the harm associated with the development, including its inconsistency with the development plan.

**The application is therefore recommended for approval subject to conditions and a section 106 Agreement, in accordance with Key Issue M.**

In accordance with the Town and Country Planning (Consultation) (England) Direction 2021, should Members resolve to grant planning permission for the application, the Council will need to consult with the Secretary of State prior to taking a decision, to provide them with an opportunity to consider using the power to call in an application under section 77 of the Town and Country Planning Act 1990. If the planning application is called in, the decision on whether or not to grant planning permission will be taken by the Secretary of State.

**Key Issue M. Recommendation**

- A. That the Applicant be advised that the Local Planning Authority is disposed to grant planning permission, subject to the completion, within a period of six months from the date of this committee, or any other time as may be reasonably agreed with the Service Director, Planning



**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

and Sustainable Development and at the Applicant's expense, of a planning agreement made under the terms of Section 106 of the Town and Country Planning Act 1990 (as amended), entered into by the Applicant to cover the following matters:

- i. Free Public Access – public access shall be afforded in perpetuity to the areas of the site identified for public access on Page 66 of the DAS (or a standalone plan 11585-LD-SKE-23022 A), at no expense to members of the public in perpetuity, between 8am-7pm (June – September) and 8am-5pm for the remainder of the year.
  - ii. Management of Public Areas - the maintenance of the areas of the site identified for public access on Page 66 of the DAS (or a standalone plan 11585-LD-SKE-23022 A), shall be the responsibility of the Management Board in accordance with the Management Plan. The Detailed Management Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby approved, and shall be in accordance with the structure and responsibilities outlined in Chapters 4, 5, and 6 of the approved Management Plan (authored by Savills). The structure of the Management Board, its responsibilities and commitments shall be defined by a Detailed Management Plan.
  - iii. Affordable housing contribution – in accordance with the Affordable Housing Practice Note (July 2022), the Owner commits to securing a minimum provision of 20% affordable homes and early delivery of the development.
  - iv. Fire Hydrants - the contribution in the sum of thirteen thousand five hundred pounds (£13,500.00) Index Linked payable to the Council by the Owner prior to the first occupation of development. This is to pay for the installation of a 9no. fire hydrants as per Avon Fire and Rescue's comments.
  - v. Employment Skills - the sum of two thousand pounds (£2,000.00) Index Linked to be used by the Council towards the Council's costs and expenses incurred by the Council in monitoring the implementation of the Employment and Skills Plan.
  - vi. Travel Plan - the contribution in the sum of five thousand six hundred and ninety three pounds (£5,693) Index Linked payable to the Council by the Owner prior to the commencement of development for the Council to undertake monitoring and auditing; or the contribution in the sum of four thousand one hundred and twenty pounds (£43,120) Index Linked payable to the Council by the Owner prior to the commencement of development for the Council to undertake the implementation of the Travel Plan on the Owner's behalf
  - vii. Highway Works – the extent and scope of the s278 Agreement (under the Highway Act 1980) to ensure it will address the area within the highway surrounding the site, up to the back of footways on the opposite side of the respective roads to the site, including Northcote Road, Guthrie Road, and College Road. The extent and scope of the s38 works under the Highway Act 1980 shall also be secured.
- B. That the Head of Legal Services be authorised to conclude the Planning Agreement to cover matters in recommendation (A).
- C. That on completion of the Section 106 Agreement, planning permission be granted, subject to conditions, for which delegated authority is sought to prepare the conditions in consultation with

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

the Applicant in line with the Town and Country Planning (Pre-commencement Conditions) Regulations 2018. A list of expected conditions is included below, albeit the following list is not exhaustive:

*Procedural*

- Requirement to commence development within 18 months of the date of decision. The key reason for departing from the standard (3 years) commencement period relates to the need to avoid deterioration to the landscape and heritage values of the site, which a 3 year commencement period could allow.
- Requirement for the development to be carried and to accord with all approved plans/documents.

*Clifton Conservation Hub*

- A condition to restrict the operation of the building:
  - In accordance with plan ref. BZG-PPA-CCH-ZZ-SK-A-1101 PL1 the extent of floorspace occupied by main town centre uses within the Clifton Conservation Hub building shall be limited to no more than 200 sq.m, and shall only be used for the following purposes as defined by Classes E(a) and (b), and F1(e).
  - Main town centre uses are those defined by the Policy DM7 (para 2.7.6) and the Glossary to the NPPF.
- A condition to restrict the operation of the building in accordance with the uses identified on approved plan ref. BZG-PPA-CCH-ZZ-DR-A-1100-PL1. With the exception of the 'café' floorspace and its ancillary floorspace, all remaining floor space shall be retained as community facilities, as defined by paragraph 4.12.2 of policy BCS12 of the Bristol Local Plan (Adopted) 2021.
- A condition to require that when the Clifton Conservation Hub is open, its WCs/toilets shall be open to members of the public.
- A condition to secure management and mitigations measures for noise and fumes from the café.
- A condition to restrict opening hours to 07:30 to 22:30.
- A condition to restrict the collection of refuse and recyclables to between 08:00 and 20:00 Monday to Saturday and not at all on Sundays or Bank Holidays.

*Heritage and Urban Design*

- A condition to secure a phasing plan to ensure public benefits are realised – i.e. conversion / refurbishment of assets.
- A condition to secure measures in the interest of crime and antisocial behaviour prevention.
- A condition to secure details of the all works to the existing boundary wall, including details or retention, materials, and finish.
- A condition to secure details of external facing materials to be used within the development.
- A condition to secure the submission of a materials sample panel.
- A condition to secure section details of all buildings.
- A condition to require details of the strategy to interpret and understand the history of the site, including its interpretation.
- A condition to ensure that archaeological remains and features are recorded prior to their relevant works.
- A condition to secure the submission of public art plan in accordance with the Outline Public Art and Culture Strategy.
- A condition to secure the implementation of accessible homes i.e. M4(2) and M4(3) compliance.
- A condition to appropriately restrict permitted development rights the proposed uses would benefit from, in the interests of the setting of heritage assets, the character of the area, and securing the design-intent in the long term.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

*Residential Amenity*

- A condition to secure a construction environmental management plan to safeguard the amenity of neighbours and the area more generally.
- A condition to ensure the development is carried out in accordance with all recommendation detailed in the Noise Assessment submitted with the application.
- Conditions to secure that noise from the development is limited to 5dB below pre-existing background levels at residential premises.
- A condition to require the submission of an assessment of noise from Clifton College Music School, along with any required mitigation measures required within the development.
- Conditions to secure obscure glazed/non-opening windows in accordance with the approved plans for:
  - Block E1 (in relation to no. 10 Northcote Rd)
- Conditions to secure obscure glazed/non-opening windows not in accordance with the approved plans for:
  - Block E2 – first and second floor bathroom windows within the two flats at the very north of the building.
- Conditions to ensure the top floor area labelled ‘maintenance access only’ in Blocks E1 and E2 shall not be used as external amenity areas.
- Conditions to secure balustrade details for Block S1 to limit potential overlooking from primary rooms.
- Conditions to secure that all windows above ground floor within the western elevation of Block S1 shall be obscure-glazed, and non-opening unless the parts of the window which can be opened are more than 1.7 metres above the floor of the room in which the window is installed.
- Conditions to secure details of the boundary treatment between the Joseph Cooper Music School and the new access adjacent to Block S1 shall be provided to ensure the privacy of the Joseph Cooper Music School is safeguarded.

*Landscape and Arboriculture*

- Conditions to secure various tree protection information, including method statements in relation to underground services.
- Conditions to secure a revised landscape strategy and plans, including:
  - Replacement planting – minimum of 192 replacement trees
  - Require implementation of 44 translocated trees and replanting if failure to take
  - Street lighting – to protect existing trees and proposed trees
  - Boundary treatments
  - Site furniture
  - Wayfinding strategy
  - Details of site-wise safety features, including the Lake and Play Area
  - Details of the children’s play area, including to scale plans

*Sustainable Design*

- A condition to secure compliance with the submitted Energy Statement.
- A condition to secure further details of the propose heat pumps.
- A condition to secure further details of the PV panels.
- A condition to secure further details of broadband connection.
- A condition to secure further details of embodied carbon.
- A condition to secure further details of air tightness within the proposed buildings.
- A condition to secure further details of the sustainable urban drainage system in accordance with the submission (B35A).

*Land Contamination*

**Development Control Committee A – 26 April 2023****Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- Standard conditions requiring initial contamination investigations and any necessary remediation works together with subsequent verification, and unexploded ordnance, in accordance with the Public Protection Team's (Land Contamination) comments.

*Transport*

- A vehicular access and movement plan will be secured by condition. In accordance with the submitted details, the plan will provide further details of the controls over vehicles accessing the site, including how parking will be controlled.
- A condition to secure the implementation of satisfactory signage in the interests of minimising vehicular movements within the site.
- A condition to secure a refuse and general servicing management plan.
- A condition to secure general arrangement details of works in the highway (B1B).
- A condition to secure a construction management plan to ensure the effects of traffic during construction are acceptable (B38).
- A condition to secure details of a car club scheme (C35).
- Conditions to secure the implementation of vehicular, pedestrians and cyclists accesses (C7A, C8, and C36)

*Nature Conservation*

- A condition to ensure the construction environmental management plan complies with the recommendations made in the Ecological Impact Assessment (The Landmark Practice, October 2022) and the Shadow HRA (The Landmark Practice, October 2022) i.e. to avoid offences against legally protected and priority species and habitats during construction (including site clearance, pollution prevention, demolition, vehicular movements and lighting impacts), and to avoid any impact on the Avon Gorge Woodlands SAC.
- A condition to secure the submission of a 30 Year Landscape and Ecological Management Plan, along with the a biodiversity net gain as per the submission.
- A condition to secure a method statement for a Precautionary Method of Working in relation to a number of species and their habitats.
- A condition to secure a bat mitigation method statement.
- A condition to secure an ecological mitigation and enhancement strategy.
- A condition to secure a method statement concerning establishing and maintaining the proposed living roofs.
- A condition to ensure vegetation clearance does not detrimentally impact wild birds and their nests.
- A condition to secure details external lighting to ensure it would not harmfully impact protected bats and other nocturnal wildlife, whilst still adequately lighting the site's routes.
- A condition to ensure if the development does not commence within 18 months, an updated ecological survey will be provided.

*Miscellaneous*

- A condition to secure the submission of an employment and skills plan.

# Bristol Zoo Application Comments Summary

22/02737/F

## **Appendix 1 - Contributor Comments**

DC Committee date 26<sup>th</sup> April 2023

Notes:

- This document includes comments from contributors, including but not limited to statutory consultees, interest groups, and resident associations. For comments from neighbours and other members of the public, please see the document titled 'Neighbour Comments'.
- It has not been possible to include all figures, tables, or pictures included within the original comments within this document.

## Index

Air Quality.....	4
Arboriculture Team (BCC).....	4
Avenue Residents Association .....	14
Avon Fire and Rescue Service .....	14
Avon Gardens Trust 1 of 3 .....	16
Avon Gardens Trust 2 of 3 .....	17
Avon Gardens Trust 3 of 3 .....	18
Bristol Civic Society .....	19
Bristol Neighbourhood Planning Network.....	21
Bristol Tree Forum 1 of 2 .....	21
Bristol Tree Forum 2 of 2 .....	26
Bristol Waste Company 1 of 2.....	36
Bristol Waste Company 2 of 2.....	36
Building Bristol - Employment and Skills .....	37
Building Safety and Construction Division (HSE).....	38
Clifton and Hotwells Improvement Society 1 of 3.....	38
Clifton and Hotwells Improvement Society 2 of 3.....	39
Clifton and Hotwells Improvement Society 3 of 3.....	40
Clifton College 1 of 4 .....	40
Clifton College 2 of 4 .....	48
Clifton College 3 of 4 c/o Highgate Transportation .....	53
Clifton College 4 of 4 .....	57
Conservation Advisory Panel 1 of 2.....	61
Conservation Advisory Panel 2 of 2.....	62
Crime Reduction Unit .....	65
Design West.....	66
Downs For People .....	69
Flood Risk Manager.....	74
Economic Development.....	75
Highways England (also referred to as National Highways) .....	75
Historic Buildings And Places .....	75
Historic England 1 of 3.....	77
Historic England 2 of 3.....	81
Historic England 3 of 3.....	83
Housing Enabling Team 1 of 3.....	83
Housing Enabling Team 2 of 3.....	85
Housing Enabling Team 3 of 3.....	88
Land Contamination (BCC).....	90
Mall Gardens Residents Association .....	92
National Highways .....	92

Natural England 1 of 3 .....	95
Natural England 2 of 3 .....	96
Natural England 3 of 3 .....	97
Nature Conservation (BCC) .....	97
Northcote Road Residents Association 1 of 3 .....	104
Northcote Road Residents Association 2 of 3 .....	106
Northcote Road Residents Association 3 of 3 .....	110
Pollution Control 1 of 2 .....	116
Pollution Control 2 of 2 .....	117
Public Art Team.....	118
Save Bristol Zoo Gardens.....	118
Sustainable City Team (BCC) 1 of 3.....	121
Sustainable City Team (BCC) 2 of 3.....	123
Sustainable City Team (BCC) 3 of 3.....	124
The Victorian Society 1 of 2 .....	124
The Victorian Society 2 of 2 .....	126
Transport Development Management 1 of 3 .....	126
Transport Development Management 2 of 3 .....	133
Transport Development Management 3 of 3 .....	139
Twentieth Century Society .....	146
Urban Design Team .....	148
Wessex Water .....	157

## Air Quality

Date: 15<sup>th</sup> July 2022

Comment The air quality assessment concludes that, as the development will result in a net reduction in traffic movements, and that no new exposure will be introduced, the impact of the development on air quality is insignificant. I therefore have no objections to the development in terms of air quality.

## Arboriculture Team (BCC)

Date: 8<sup>th</sup> August 2022

### Arboricultural Team

Date: 07<sup>th</sup> February 2023

Black text – response to initial scheme

Blue Text – response to revised scheme

### Summary

I have reviewed the supporting documentation [for the revised scheme](#) which has answered most of my concerns. [I have no major objections but provide the following comments.](#)

[I am still have concerns regarding the juxtaposition between the shading from the proposed new dwellings of the lake houses, the museum and parrot house on important retained trees. The shade analysis demonstrates the rear gardens will not receive the minimum of 2 hours direct sunlight recommended by BRE during the winter months. This is outside of my field of expertise, and I can only recommend this is assessed prior to determination. To remedy my concerns, I propose a further tree preservation order is placed on the trees in and around the rear gardens prior to occupation following an amenity assessment.](#)

[I would request further detail or clarification on the location of street lighting columns and the proposed underground services and utilities \(as specified in the comments\). These can however be secured by condition.](#)

### Bristol Zoo

Bristol zoo gardens is a historic destination site with a rich history of landscape planting that has a diverse population of native and oriental species with an uneven age range from young to over mature providing a high-quality landscape. This has resulted in 19 trees recorded on the national tree register of champion trees. During the initial pre-application 21/04914/PREAPP; an amenity assessment of the site was conducted to identify the highest quality trees; that in the current context should be protected by a tree preservation order to secure them into the future. Tree Preservation order 1438 was confirmed on 20th October 2021. Many of the trees on site are rare and unusual species that, although they are not climax landscape trees are an important and intrinsic part of the character of Bristol Zoo Gardens and the wider Clifton and Downs conservation areas.

We have worked at length with the design team during the pre-application process to ensure the most important trees on site are retained. This has been taken on board throughout the process and the final design has retained a vast majority of the important trees.

### Supporting documentation

Supporting documentation that have been reviewed in relation to trees includes:

Page | 4



- Arboricultural report AIA & AMS
- [Tree protections phase 1-3](#)
- Design and access statement
- Landscape Design Statement
- [Combined proposed services and RPA Plan](#)
- Landscape Site Plan
- [Proposed tree schedule](#)
- Planting Plans 1 to 4
- Soft Landscape Key
- Management Plan
- [Price and Myers Drainage Plans](#)

**Tree Survey**

The supporting Arboricultural Report is an assessment of the 218 trees & 45 tree groups on site. The details presented within the Arboricultural Implications Assessment and Method Statement are reasonable. A number of conditions should be applied to secure the working methodologies through the development process.

**Tree Preservation order**

Tree Preservation order 1438 was an initial amenity assessment of the landscape trees within the current context of the zoo gardens prior to any planning applications being made to ensure the highest quality landscape trees were a material consideration during the planning process.

Following the completion of the development a further amenity assessment should be undertaken to assess the changing public amenity of the remaining trees, the re-development of the site will allow public access during the day and the addition of new homes, pedestrian paths and the remodelling of the lake may increase the amenity value of trees. Additional pressures from the new dwellings on adjacent trees with a high amenity value should be further protected.

T15 Loquat (*Eriobotrya japonica*) has been proposed for removal to facilitate the development of the perimeter apartments on the northern boundary of the site. The tree is located within very close proximity to the western elevation of the Twilight World building. Translocation of the tree would be very hard to achieve and therefore its loss is regrettably necessary if the proposed is consented. Within the landscape plans 3 replacement *Eriobotrya* have been proposed to secure this species longevity within the development.

Influence of proposed development on TPO 1438 & tree register trees.

Tree no	Common name	Tree reg Status	TPO 1438	BS5837 Cat	Development influence
2	Austrian pine	-	Yes	A2	Retained
3	Copper beech	-	Yes	A2	Retained

5	Wedding cake tree	National	Yes	B2	Retained Soli Amelioration
15	Loquat	County	Yes	B2	Proposed removal
17	Zelcova	National	No	U	Removal poor health
25	Lobner's magnolia	National	Yes	B2	Retained
32	Monkey puzzle	-	Yes	A2	Retained
40	Cherry ( <i>P.Pandora</i> )	County	No	C2	Retained
42	Silver lime	-	Yes	B2	Retained
44	Silver lime	-	Yes	B2	Retained
46	Turkey oak	-	Yes	B2	Retained
47	Noble beech	-	Yes	A2	Retained
48	English oak	-	Yes	B2	Retained Soli Amelioration
50	Sweetgum	Yes	A2	Retained	
52	Turkish hazel	Remarkable tree	Yes	A2	Retained
54	Box-leaved Azara	County	Yes	B2	Retained
58	Handkerchief tree	Remarkable tree	Yes	A2	Retained
66	Hornbeam	-	Yes	A2	Retained
69	Weeping copper beech	County	Yes	B2	Retained
72	Foxglove tree ( <i>Fargesii</i> )	County	Yes	B2	Translocated
76	Dwarf variegated sycamore	County	Yes	B2	Retained
83	Eastern Hawthorn	National	Yes	A3	Soil Amelioration
87	Variegated sweetgum	County	Yes	B2	Translocated
95	Ginkgo ( <i>Horizontalis</i> )	Remarkable tree	Yes	A2	Retained
100	Maidenhair tree	-	Yes	A2	Retained
108	Incense cedar	-	Yes	A2	Retained
116	Common lime	-	Yes	A2	Retained
149	Tubeflower ( <i>Viburnum</i> )	National	No	C2	Retained

151	Walnut	-	Yes	B2	Retained
152	Black locust	-	Yes G1	B2	Retained
154	Pride of India	-	Yes G1	B2	Retained
158	Pride of India	-	Yes G1	B2	Retained
176	Blue Atlas cedar	-	Yes	A2	Retained
180	Taiwanese photinia	County	No	U	Removal poor health
182	Magnolia Delavayi	County	Yes	B2	Retained

### Tree Register trees

The site is fortunate to have 19 registered trees, 5 National Champions, 11 County Champions and 4 remarkable trees. Although these are recognised trees of note many of them are in a declining condition or located in less-than-ideal landscape locations. Two county champions *Malus florentina* & *Metasequoia glyptostroboides* have been removed historically prior to any application being made.

The Tree Register trees enhance the character of the proposed development and maintain a link to the historic land use as a zoological garden. The loss of the *Malus florentina* & *Metasequoia glyptostroboides* prior to the application process and the further loss of trees T17 Zelcova serratta 'Village Green' & T180 Photinia serratifolia are a significant loss. Within the landscape plans 1 Zelcova serrata 'Village Green' & 3 Photinia serratifolia have been proposed to secure this species longevity within the development.

### Translocation of trees

2 trees protected by TPO 1438 have been identified for translocation: T72 Paulownia fargesii & T87 Liquidambar styraciflua 'variegata'. This is a complex process of moving semi mature trees that does not guarantee successful establishment. Within the landscape plan 4 (South) Paulownia fargesii & 1 Liquidambar styraciflua 'variegata' have been proposed to secure this species longevity within the development.

44 trees have been identified for translocation these are made up of *Dickinsonia antarctica*, *Trachycarpus fortune* & *Cordyline australis*. The Soft Landscape – Key Plan has suggested 58 trees of a combination of these species will be planted and that 44 will be through translocating trees currently present on site; there locations have been presented on the 4 landscape planting plans. The translocation of these species is more feasible than broadleaf trees due to their root morphology, as such there is no objection in principle.

### Shading & Fenestration

Due to the dense population of trees on site the shading by trees has been a concern through the pre-application process. The revised scheme has provided a BRE sunlight assessment for the rear gardens with consideration with regards the impact of existing mature trees. The main areas of concern are the rear garden of the lakeshore houses and the former museum, The Parrot house & the grand terrace.

### BRE Guidelines: Sunlight to gardens and amenity spaces

'The assessment measures the percentage of each area that can receive at least two hours of sunlight on 21 March - the two-hours sun-on-ground (SOG) test.

If, following development, the area of the garden or other amenity space that can receive two hours of direct sunlight on 21 March is reduced to both less than 50% of its total area and less than 0.8 times its

*former value, the loss of sunlight is likely to be noticeable and the space will tend to look more heavily overshadowed’.*

*‘The Guide has very little with regard to trees and their potential effects on amenity areas but in the case of trees here as we are looking at full leaf and bare branch, we have assessed the effect of the trees on 21 June and 21 December to try to understand the mean’.*

### **Trees and Hedges**

*‘Appendix G of the BRE guide considers the implications of trees and hedges, with paragraph G1.1 stating that “Most trees species will cast a partial shade, for deciduous trees this will vary with the time of year”. The shade caused by trees in the summer months is dappled and not as dense as that caused by a building or solid obstruction.*

*The BRE guide does not have an assessment for considering the implications of trees on neighbouring existing dwellings. Paragraph G1.2 explains that it is generally more difficult to calculate the effects of trees on daylight because of their irregular shapes and because some light will generally penetrate through the tree crown. Stating that “Where the effect of a new building on existing buildings nearby is being analysed, it is usual to ignore the effect of existing trees. This is because daylight is at its scarcest and most valuable in winter when most trees will not be in leaf”.*

### **Lakeshore houses**

The lake shore houses have been designed in a semicircle which hugs the southern bank of the lake. These dwellings consist of 3 & 4 storey town houses with large trees in close proximity to the rear gardens and the lake. The large trees are imposing features within a new residential setting that have the potential of causing a perceived risk of harm as well as the loss of light to gardens.

### **The Lake houses - Shade analysis findings**

*Attached drawing 22011-SHD-002 show the Sun-on-Ground results on both 21 June (summer solstice) and the*

*21 December (winter solstice). The results indicate that of the 13 gardens considered, 11 will comfortably receive 2 hours of direct sunlight on 21 June, with only garden areas A8, which receives 2 hours of direct sunlight to 48% of its area and A11 which receives at least 2 hours of direct sunlight to 38% of its area, falling below that*

*standard.*

*The overshadowing analysis in December indicates that none of the garden will receive at least 2 hours of direct sunlight. This is common as the sun is low in the sky and the gardens will be overshadowed by the buildings, with only marginal additional shadow caused by the trees.*

The shade analysis shows none of the rear gardens will not receive at least 2 hours of direct sunlight during the winter months whilst the sun tracks close to its nadir; whether this is acceptable in planning terms is outside of my field of expertise but needs to be addressed prior to determination of the application. The BRE guidance does not consider that trees present a significant contribution to shading of dwellings.

Tress T66, T69, T72 & T176 are protected by TPO 1438. I would propose that the remaining trees located in the rear gardens are protected by a tree preservation order following a condition and amenity assessment to ensure the local planning authority are able to manage the level of works undertaken following occupation of the Lake houses. The increased access to the site would justify the elevated

amenity the trees would provide, I consider it is expedient to apply an additional tree preservation order due to the potential threat of over management due to the available light levels within the rear gardens.

The application of a tree preservation order prior to occupation would provide clear guidance to purchasers of the dwellings that the trees are features within the garden and can not be managed or removed without significant justification.

### **The Museum and Parrot house - Shade analysis findings**

*'Attached drawing 22011-SHD-005 show the Sun-on-Ground results on both 21 June (summer solstice) and the*

*21 December (winter solstice). The results indicate that of the 6 gardens considered, 5 will comfortably receive 2 hours of direct sunlight on 21 June, with garden A5 receiving 2 hours of direct sunlight to 49% of the area.*

*The overshadowing analysis in December indicates that none of the garden will receive at least 2 hours of direct sunlight. As mentioned above this due to the sun being low in the sky and the tree will only cause marginal additional shadow over the winter months.*

The shade analysis again shows that the none of the rear gardens will not receive at least 2 hours of direct sunlight during the winter months. This needs to be addressed prior to determination.

A majority of landscape trees to the north of the gardens are already protected by TPO 1438; however I would consider further assessment of trees T38, T41, T43, T45, T63, T64 T138 & T139 prudent to establish whether further protection should be afforded to these trees prior to occupation.

### **Tree Loss**

80 trees, 31 groups or part of and 3 hedges are proposed for removal to facilitate the proposed re-development. A detailed assessment in accordance with the planning obligations has been presented; 192 replacement trees are necessary to mitigate the loss. The landscape plan proposes 461 replacement trees with the translocation of a further 44 trees to maintain the mature character of the landscape. The landscape proposal fully mitigated the Planning Obligation requirements. The landscape plans should be revised to show the final locations for the 44 translocated trees.

I acknowledge that a large number of trees will be lost as a result of the proposal, but in general most of these trees are of average quality. Further, the retained trees are generally those of highest amenity value and quality.

### **Arboricultural Methodologies**

#### **Tree Protection**

Tree protection during the development has been proposed in 3 phases: Pre-demolition and ground works, Construction and road network & Landscape and footpath network. Phasing tree protection throughout the development process is not ideal as this adds a level of complexity that needs to be managed and supervised by the project arboriculturist to ensure the phasing is implemented successfully; however, given the size of the site and high number of retained trees there does not appear to be a more simplified way of approaching the tree protection.

Arboricultural supervision will need to be conditioned to secure this process.

#### **Ground Protection**

Section 7 of the Arboricultural Method Statement provides details on the level of ground protection necessary depending on the weight of pedestrian or vehicular movement proposed. The report recommends a ground protection plan to present the access routes and weight of vehicles over root protection areas during the different phases of construction. This plan can be conditioned as a pre-commencement condition to secure the information.

### **Cellular Confinement**

Cellular confinement systems have been recommended within footways and highway location within the root protection area of retained trees. These have been presented on tree protection plans, Phase 2 & 3.

The installation guidance for Cellweb has been provided within the Arboricultural Method Statement. Further information should be presented that identifies the expected weight of vehicles on these areas, specifically the road network in relation to rubbish collection vehicles and emergency services so that the correct thickness of cells can be installed to distribute the weight of heavy vehicles across the road network.

### **Services and Underground Utilities**

A Combined proposed services and RPA Plan has been provided that shows the location of all of the major services. 9 precautionary areas have been identified within the Root protection areas (RPA) of trees T6, T26, T27, T38, T56, T57, T138 & T139. None of the encroaching services are to an extent that could significantly affect the condition of the retained trees and working methodologies have been provided within the arboricultural method statement.

I have not been able to identify the locations of street lighting columns which have the potential to adversely affect the future management of retained trees and the landscape plan. 7 red dots with FH next to them are present which may represent the street lighting columns; if so the column adjacent to T138 is likely to cause a future conflict with the trees canopy depending on orientation.

The Landscape Strategy recommends extensive rainwater harvesting, Suds and water attenuation systems. All of which are below ground systems that have the potential to adversely affect the root protection areas of retained trees. The drainage plans (Price and Myers) generally suggest that drainage will avoid the RPAs of retained trees, but there are some locations where conflict with RPAs is possible, and hence a revised arboricultural method statement is needed and can be secured by condition. Further, the Landscape Statement indicates rainwater harvesting will be implemented but full detailed plans have not been provided. As a precaution, a revised arboricultural method statement should include details of any rainwater harvesting systems to support the landscape trees.

The plan shows the eastern lawn will host ground source heat pump loops. These have the potential to affect trees T125, T126, T127, T142 & T147. A revised arboricultural method statement should be required by condition to address this.

### **Landscaping**

The Landscape Strategy is a detailed document that discusses the history of the landscape since the inception of the zoo gardens through to the present day. The design concepts of tree lined streets and deep planting beds with a mixed vertical planting structure will increase the species diversity and provide enhanced habitats for wildlife.

Any landscape proposal needs to form part of a well-balanced public realm scheme which is outside of my field of expertise and therefore I cannot comment on how the proposed landscape addresses any public realm comments.

I'm unsure whether street lighting has been identified within the services plan; in my experience street lighting is one of the major conflicts with new tree planting due to canopy sizes and street lighting requires relating to column heights and light throw from each column. A street lighting plan needs to be undertaken that compliments the landscape proposals.

The planting plans 1-4 and soft landscape key present a well-balanced tree planting scheme with a diversity of tree families, genus and species that assists in future proofing the site from the effects of climate change and genus specific tree pathogens.

Replacement planting for the lost Tree Register trees and translocated TPO trees have been included which maintains the species presence on site which is well received.

## **Policy compliance**

### **National and local policy guidance relating to trees and green infrastructure**

The abridged policy guidance below identifies the criteria that has been used to assess the scheme.

#### **National Planning Policy Framework (2021)**

The national Planning Policy Framework (2021) sets out the overarching objectives to secure net gains across each of the objectives through planning policies, guiding development towards sustainable development. The environmental objectives are to protect and enhance the natural environment and improve biodiversity.

#### **Paragraphs**

*131. Trees make an important contribution to the character and quality of urban environments. Policy decisions should ensure new streets are tree-lined; unless there are compelling and justifiable reasons why it is inappropriate. Existing trees should be retained where possible and further opportunities are taken to incorporate trees in developments.*

The landscape plans proposed tree lined streets and wide planting beds over the majority of the site. The Arboricultural Assessment has identified the most important trees and all but one (T15) have been retained.

*174. Planning policies and decisions should contribute and enhance the natural environment; recognising the intrinsic benefits from natural capital and ecosystem services including trees and woodlands to minimising impacts on and proving net gains for biodiversity.*

The landscape scheme has proposed 461 new trees which mitigates the trees losses in accordance with the Planning Obligation requirements. The proposed wide planting beds are an addition to ecosystem services.

*180. If significant harm to biodiversity resulting from a development cannot be avoided, mitigated or compensated; planning permission should be refused.*

*Development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland and ancient or veteran trees should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists.*

No ancient or veteran trees will be adversely affected by the proposed.

#### **Core Strategy Policy BCS9**

*'Individual green assets should be retained where possible and intergraded into new development. Loss of green infrastructure will only be acceptable where it is allowed for as part of an adopted Development Plan Document or is necessary, on balance, to achieve the policy aims of the Core Strategy. Appropriate mitigation of the lost green infrastructure assets will be required'.*

#### **DM15: Green infrastructure provision**

*Green infrastructure provision facilitates a positive effect on people's health by providing space and opportunities for sport, play and social interaction; improves the quality of visual and natural environment; performs important functions such as mitigating flood risk, removing pollutants from the air and cooling rising urban temperatures. Green infrastructure also protects and enhances local nature conservation, creating and connecting habitats for wildlife.*

#### **Trees**

***The provision of additional and/or improved management of existing tree will be expected as part of the landscape treatment of new development.***

***The design, size, species and placement of trees provided as part of the landscape treatment will be expected to take practicable opportunities to:***

- I ***I. Connect the development site to the strategic green infrastructure network, and/or Bristol Wildlife Network.***
- II ***II. Assist in reducing or mitigating run-off and flood risk on the development site.***
- III ***III. Assist in providing shade and shelter to address urban cooling.***
- IV ***IV. Create a strong framework of street trees to enclose or mitigate the visual impact of the development.***

The proposed seeks to improve the exiting management of green infrastructure across the site with additional tree and herbaceous planting which is supported in part by Suds, water attenuation and rainwater harvesting solutions. A strong framework of street trees is proposed.

#### **DM17: Development Involving Existing Green Infrastructure**

Trees are considered valuable multifunctional green infrastructure asses. The policy seeks to protect the most valuable trees and in line with the Core Strategy approach to green infrastructure assets, mitigate for the loss of other important trees by securing replacement tree on-site or in the public realm. The tree compensation standard provides a suitable mechanism to determine the appropriate level of mitigation where loss of trees is proposed as part of the development.

#### **Trees**

- **All new development should integrate important existing trees**
- **Development which would result in the loss of ancient woodland, aged trees or veteran trees will not be permitted.**
- **Where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided, in accordance with the tree compensation standard.**



The landscape plan fully mitigates tree loss in accordance with the planning obligations SPD. The most important trees on site, those on the Tree Register and those protected by TPO 1438 have been retained or translocated (Except T15). No ancient or veteran trees will be adversely affected by the proposed.

## **Conclusion**

The proposed scheme, as a whole, provides a well-balanced assessment of the existing trees and how the addition of new planting can complement the future development of the site.

The supporting Arboricultural Report provides a detailed assessment of the scheme as well as working methodologies where development could adversely affect the retained trees.

The re-development of the zoo gardens will require the installation of substantial services, utilities and water management systems that all require excavation to industry specific depths and distances from other systems. [The Combined proposed services and RPA Plan has addressed the locations of a majority of services; I have to question whether the street lighting has been presented. I also wish further detail on the water management system and its locations; this could be a pre-commencement condition, however.](#)

[The shade analysis has confirmed that the rear gardens of both the lake houses, the museum and parrot house do not get 2 hours of direct sunlight during the winter months which you would have to address because this is outside of my field of expertise. I still consider that the trees in the rear gardens and in close proximity to the rear gardens are at risk of increased pressure to prune or remove following occupation and therefore I have proposed to undertake a further amenity assessment considering their location post development and decide whether a further tree preservation order in these areas would be expedient.](#)

[I would still like further evidence on the location of street light columns and the water management system across the site. These are however potentially pre-commencement conditions if you are minded to take the application to committee as it is.](#)

Bristol zoo are unlikely to be the developer of the site and it is my understanding that the site will be sold with full planning consent in place. Due to the change from pro-active design and aspiration for the site there is uncertainty whether the purchasing developer will have the same aspirational concerns. [Below is a list of condition I would apply to any decision notice if you are minded to recommend granting permission at committee; full conditions will be provided prior to committee.](#)

## **Additional Information Required**

**Street lighting plan** – Location of lighting and how these effects proposed landscaping

**Water management plan** – underground location of services within the root protection of retained trees.

[The above however can be secured by condition.](#)

## **Conditions**

### **Pre-commencement**

**Tree protection** – Phase 1

**Ground protection Plan** – Site specification for appropriate ground protection depending on predicted weight of vehicles through the construction process.

**Arboricultural method statement** – to address as a minimum, below ground services and utilities.

### **During construction**

Tree Protection – All phases.  
Arboricultural Method Statement

### **Arboricultural supervision**

Supervision during key stages of development (to be confirmed in advance of any final decision being made)

- • Tree protection phases 1-3
- • Demolition of structures within the RPA of retained trees
- • Ground protection – installation during phases 1-3.
- • Translocation of TPO trees, Trachycarpus, Dicksonia & Cordyline
- • Cellular confinement within RPA of retained trees
- • Soil level changes within the RPA of T2

### **Landscape planting**

Compliance condition with 5-year replacement for failures.

### **Avenue Residents Association**

Date: 29<sup>th</sup> June 2022

Comments: On Behalf of The Avenue Residents Association. BS8

A number of residents of The Avenue have asked the Residents Association to object to the plans as proposed.

There are numerous objections but they can be summarised as follows:

- 1) The density of the proposed development is far too high. It is clear that the Zoo's only interest is to maximise profit without any regard to the legacy it will leave.
- 2) The height of the buildings will significantly impact light on adjacent properties and will be an eyesore.
- 3) The design of the proposed is out of keeping with existing properties, looks awful and will age in a very short period of time.
- 4) The comments on parking are naive and frankly ridiculous. The Avenue will be clogged with residents and their visitors.
- 5) The traffic access onto Guthrie Road will cause severe congestion and will be a safety hazard especially during busy hours at the school. Even at the moment it can take 10 minutes to access Pembroke Road from The Avenue during school drop off. There have been several near misses with school children already. There has been no consideration of vulnerable road users.

Regards

The Avenue Residents Association.

### **Avon Fire and Rescue Service**

Date: 22<sup>nd</sup> August 2022

Our reference: JG/FG/22/02737/F

Further to the planning application reference 22/02737/F Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA, Avon Fire & Rescue Service will have additional Hydrant requirements associated with this application, please see attached plan as to our hydrant requirements. The costs will need to be borne by developers through developer contributions. I have set out below the calculated costs per Hydrant. Avon Fire & Rescue Service aim is ensuring members of the community are safe from fire and feel safe within their own homes by taking a risk assessed approach. We work with partner agencies developing strategies to help reduce the risk of fire within the community, and also assisting our partners in achieving their targets. Our current strategy to reduce risk is simple: prevention, protection, response. Where efficiencies can be made we will work in partnerships to achieve these strategies. For example, we can bring positive

Page | 14

change through effective education, influencing safer design of products, buildings and many other fire prevention activities. In the event of a fire occurring we want to ensure that people are protected, remain safe and can escape unharmed. We can achieve this by enforcing fire safety regulations in buildings and undertaking home fire safety checks, including the fitting of smoke alarms. It is important that our communities know that if they need our help, we can respond to a range of emergencies, including fires and rescues. Central Government does not provide any funding to Avon Fire & Rescue Service for the capital cost of growth related infrastructure. Where possible Avon Fire & Rescue Service will need seek and explore opportunities in relation to funding from other sources to meet the changing demands within its operational area. Therefore, Avon Fire & Rescue Service may need to become reliant on local support funding through either developer contributions, Section 106 of the Town and Country Planning Act 1990, through the Community Infrastructure Levy (CIL). These developments will contribute to a significant increase in demand for Avon Fire & Rescue Service. As the population increases, so does the demand. This has an added impact upon the current resources therefore stretching our assets to meet this demand. It is accepted that Avon Fire & Rescue Service will not be increasing the number of resources or assets to manage with this growth. However Avon Fire & Rescue Service is seeking to formulate discussions to move fire stations to meet these new increasing demands. These plans will ensure Avon Fire & Rescue Service is able to ensure a fire engine will arrive at a Category '1' building fires within eight (8) minutes, as set by Avon Fire & Rescue Service Chief Fire Officer/Chief Executive Officer Simon Shilton and fully endorsed by the Fire Authority (Elected Councillors) Members. Fire Hydrants The additional residential and commercial developments will require additional hydrants to be installed and appropriately-sized water mains to be provided for fire-fighting purposes. This additional infrastructure is required as a direct result of the developments and so the costs will need to be borne by developer. Avon Fire & Rescue Service has calculated the cost of installation and five years maintenance of a Fire Hydrant to be £1,500 + vat per hydrant. Importantly, these fire-fighting water supplies must be installed at the same time as each phase of the developments is built so that they are immediately available should an incident occur and the Fire & Rescue Service be called.

Accompanying map:



### Avon Gardens Trust 1 of 3

Date: 8<sup>th</sup> July 2022

Description: Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings. (Major) Application

Ref: 22/02737/F

The Avon Gardens Trust is a member organisation of the Gardens Trust and works in partnership with it in respect of the protection and conservation of historic parks and gardens, and is authorised by the GT to respond on GT's behalf in respect of such applications. The Trust refers to the above planning application. The site lies within Bristol City Council's Clifton and Hotwells Conservation Area and abuts the Downs Conservation Area to the north. Paragraph 7.1.2b of the Clifton & Hotwells Character Appraisal & Management Proposals (2010) describe the Zoo Gardens: 'The combination of formal Victorian Gothic architecture and mature planting are an essential focus of this part of the conservation area.' Bristol Zoo Gardens are also designated as a Local Historic Park/Garden and an Important Open Space. The Trust understands the Zoo's objective to raise funds in order to relocate the Zoo to The Wild Place. Nevertheless, the Trust is concerned that the proposals represent overdevelopment of the site. The proposed extent and scale of development, and the site layout, would result in the Gardens being enclosed by extensive and overbearing blocks of development up to 6 storeys high. The essential

character and quality of the Zoo Gardens would be lost, with resultant impact to the character of this part of the Clifton and Hotwells Conservation Area. The Arboricultural Report describes the many important trees within Bristol Zoo Gardens. The development would result in the loss of 80 trees and 31 groups or part groups of trees. The translocation of 17 trees, 11 part groups and 2 hedges is proposed as part of the proposals, but the Trust is concerned as to whether such translocations would be successful. Whilst the Arboricultural Report includes a drainage plan overlay showing root protection areas, there will be a need for other below ground services and the location of these may result in further trees needing to be removed, and difficulty in accommodating new planting. The proximity of some trees to proposed buildings, and the need for working areas and construction compounds, may also result in difficulties during the construction period leading to the loss of further trees. The character and quality of the Gardens would also be eroded by the intrusion of residents' cars, and the likelihood of extensive on street parking, given the low parking provision planned.

Summary:- The Trust objects to the proposed development as it considers that the proposed development would be in contravention of the Bristol Development Framework Core Strategy Policy BCS22. The proposed development would fail to 'safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance', namely the Local Historic Park / Garden of Bristol Zoo Gardens.

Yours sincerely, Kay Ross MA

### Avon Gardens Trust 2 of 3

Date: 21<sup>st</sup> November 2022

Location: Bristol Zoo Gardens, Guthrie Road, Clifton, Bristol BS8 3HA

Description: Redevelopment of site to include 196 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings. (Major)

Application Ref: 22/02737/F

The Avon Gardens Trust is a member organisation of the Gardens Trust and works in partnership with it in respect of the protection and conservation of historic parks and gardens, and is authorised by the GT to respond on GT's behalf in respect of such applications.

The Trust refers to the above planning application and our letter of 7th July 2022 which provides our comments on the original submission. Thank you for inviting us to further comment on the revised drawings.

The revised proposals include a reduction of the number of residential units from 201 to 196, reduction in height of the extension to the clock tower building, changes to materials and elevational treatments of the proposed buildings, and changes to the design of the pedestrian accesses and pocket park on the north east corner of the site.

However, the Trust remains concerned at the impact of the proposed development on this Local Historic Park/Garden and on the character of this part of the Clifton and Hotwells Conservation Area. The Trust is still strongly of the opinion that the proposed extent and scale of development, and the site layout, would result in the Zoo Gardens being enclosed by extensive and overbearing blocks of development. The essential character and quality of the Zoo Gardens would be lost, with resultant impact to the character of this part of the Clifton and Hotwells Conservation Area. Although the gardens would be open to the

public, the massing of development and introduction of vehicles to the site would reduce the quality of visitor experience.

The Trust also remains concerned at the impact on trees, in particular TPO trees. The development would result in the loss of 80 trees and 31 groups or part groups of trees. The translocation of 17 trees and 11 part groups (41 total trees), and 2 hedges is proposed as part of the proposals, but the Trust is concerned as to whether such translocations would be successful. Whilst the Arboricultural Report includes a drainage plan overlay showing root protection areas, there will be a need for other below ground services and the location of these may result in further trees needing to be removed, and difficulty in accommodating new planting. The proximity of some trees to proposed buildings, and the need for working areas and construction compounds, may also result in difficulties during the construction period leading to the loss of further trees. Future residents of the development may also call for trees to be removed where they are considered to be too close to windows, and block views out, even where daylight and sun lighting requirements are met.

Summary:- The Trust maintains its objection to the proposed development as it considers that the proposed development would be in contravention of the Bristol Development Framework Core Strategy Policy BCS22. The proposed development would fail to 'safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance', namely the Local Historic Park / Garden of Bristol Zoo Gardens.

Yours sincerely,  
Kay Ross MA  
Chair, Avon Gardens Trust

**Avon Gardens Trust 3 of 3**

Date: 20<sup>th</sup> January 2023

The Avon Gardens Trust is a member organisation of the Gardens Trust and works in partnership with it in respect of the protection and conservation of historic parks and gardens, and is authorised by the GT to respond on GT's behalf in respect of such applications. The Trust refers to the above planning application and our letters of 7th July and 21st November 2022 which provide our comments on the original submission and revised drawings. Thank you for inviting us to comment on further revised drawings and other additional information submitted, which has been published on the Council website this month. The revised proposals include minor changes to Blocks E1 – E3 to deal with complaints about potential overlooking. These appear to comprise changes to the locations of windows and internal layouts, but no mention is made of any overall reduction in height of the Blocks. A revised landscape masterplan has been submitted but the only change we have noted relates to the landscape of the terrace to Block E3, which is increased in width by 1m to reduce overlooking from the garden to Pooles House. Additional pedestrian accesses are provided, shown on a Revised Site Access Strategy, at the north east corner of the site onto Northcote Road (which had already been submitted), and also now additional pedestrian accesses from College Road, Guthrie Road, and the southern end of Northcote Road. Perhaps you could advise if there are any further changes to the landscape masterplan, or the overall height and massing of the development, which we have not gleaned from the submitted drawings and information. The Trust remains concerned at the impact of the proposed development on this Local Historic Park/Garden and on the character of this part of the Clifton and Hotwells Conservation Area.

The Trust is still strongly of the opinion that the proposed extent and scale of development, and the site layout, would result in the Zoo Gardens being enclosed by extensive and overbearing blocks of

Page | 18

development. The essential character and quality of the Zoo Gardens would be lost, with resultant impact to the character of this part of the Clifton and Hotwells Conservation Area. Although the gardens would be open to the public, the massing of development and introduction of vehicles to the site would reduce the quality of visitor experience. The Trust also remains concerned at the impact on trees, in particular TPO trees. The development would result in the loss of 80 trees and 31 groups or part groups of trees. The translocation of 17 trees and 11 part groups (41 total trees), and 2 hedges is proposed as part of the proposals, but the Trust is concerned as to whether such translocations would be successful. Whilst the Arboricultural Report includes a drainage plan overlay showing root protection areas, there will be a need for other below ground services and the location of these may result in further trees needing to be removed, and difficulty in accommodating new planting. The proximity of some trees to proposed buildings, and the need for working areas and construction compounds, may also result in difficulties during the construction period leading to the loss of further trees. Future residents of the development may also call for trees to be removed where they are considered to be too close to windows, and block views out, even where daylight and sun lighting requirements are met.

Summary: - The Trust maintains its objection to the proposed development as it considers that the proposed development would be in contravention of the Bristol Development Framework Core Strategy Policy BCS22. The proposed development would fail to 'safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance', namely the Local Historic Park / Garden of Bristol Zoo Gardens.

Yours sincerely, Kay Ross MA Chair, Avon Gardens Trust

## **Bristol Civic Society**

Date: 12<sup>th</sup> July 2022

22/02737/F Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings.

### **Principle of redevelopment**

The Zoo Gardens are designated as public open space in the development plan and on reflection the Society is not convinced by the current plans to partially develop the site for housing whilst retaining open space as publicly accessible gardens. We think that the proposal is neither fish nor fowl. It would be better either being kept as open space or redeveloped for housing. The Society questions who will wish to visit the site when it is surrounded and dominated by private housing. The special character of the existing Gardens will be further eroded with vehicles accessing an area where no vehicles have previously been permitted, both passing through the open space and parking there on a permanent basis. The verdant nature of the area will inevitably be completely transformed. In addition, there will be the challenge of maintaining such a significant area of open space, presumably paid for by service charges on future residents. There will be inevitable pressure to create a gated community at some point in the future. The Zoo Gardens currently provide an oasis of calm that has been enjoyed by Bristolians for generations. We consider that they are of such special environmental and historical importance that they should be retained as a fully accessible public asset.

### **Detailed response**

Nevertheless, if the development in something like its current housing plus open space form is accepted, we have the following comments. In our response to the earlier consultation we welcomed the principles

Page | 19

published to guide the future of the Bristol Zoo site. The Society has considered whether the proposals match the aspiration of these principles. In particular, the aim to create an inspiring and sustainable development that celebrates the sites natural and built heritage. We will create space for communities to thrive and the wider public to enjoy a legacy to make us and Bristol proud. The retention of open space for future public access (even if used less than if it was completely open space), and the reuse of historic buildings, are positive proposals. The proposed Conservation Hub is welcome. However, in the Society's view the current proposals fall short of the stated aspirations in a number of ways. Aspects of the proposals also cut across adopted development plan policies, in particular DM17 in the Bristol Local Plan Site Allocations and Development Management Policies which states, Development on part, or all, of an Important Open Space as designated on the Policies Map will not be permitted unless the development is ancillary to the open space use. The Society has reservations over the heights of several of the proposed residential blocks and considers that further detailed assessment will be required. The Society also has reservations about the quality of the architecture, and notes that others have also expressed the view that this site deserves building design proposals which make a much more positive contribution to the appearance of the Conservation Area and to the setting of Listed Buildings. This particular issue remains a critical aspect when making an overall assessment of the case to change the main use of the site. The Society is disappointed by the lack of ambition with respect to the eco credentials of the project, particularly with such a high level of car provision in such an accessible location.

#### Height of buildings

The Society has significant reservations about the heights of several of the proposed residential blocks and considers that further detailed assessment will be required. These reservations concern the impact of the heights of the perimeter blocks on the wider conservation area and on the internal character of the gardens themselves. The latter concern also applies to the town houses arcing around the lake, albeit to a lesser extent. Further assessment is required with respect to the proposed residential blocks to the north and northeast. At 7 storeys the corner block may well have adverse impacts both on the general appearance of the Conservation Area and on the specific amenities of neighbouring properties. Whilst the heights on the northern edge reduce gradually from 6, 5 and 4 storeys there is a need to carefully assess their visual impact. The Society is not convinced that the planning application demonstrates the potential impact of the proposed buildings by means of verified views. It has proved difficult to identify which views are being demonstrated and to assess in detail the potential future impact, particularly on neighbouring residents.

#### Clifton Conservation Hub

The Society welcomes the proposal to repurpose the iconic entrance building to provide for a range of conservation related activities. This seems an appropriate future for this historic part of the site.

#### Vehicle access, circulation, and parking

The Society is disappointed by the lack of ambition with respect to future car ownership and parking. Surely this well-located site has the potential to become an exemplar for a car-free development. The developers own plan showing resident routes to key local facilities provides very real evidence that key local facilities are all within easy walking distance. The need to provide circulation routes and undercroft parking areas makes the development much more invasive in terms of its impacts on the gardens than would be necessary with a car-free scheme. Details are required to demonstrate how the proposed vehicle access off Northcote Road will actually operate in practice. The Guthrie Road access exists and is more straightforward in terms of future operation.

#### Retention of public access



As noted above, there is clearly a challenge in retaining public access to the open spaces when they will be bounded by private residential areas. The juxtaposition of private and public outside areas will need very careful design and planning to ensure satisfying experiences for all parties. There is lack of clarity about the future of the water body is it really to be utilised for wind surfing and boating or for more conservation related purposes? As the illustrations demonstrate, and notwithstanding the efforts made to avoid significant incursions into the gardens, the Society fears that much of the essential character of the gardens will be lost. This is because of the likely visual dominance of the apartment blocks and the resulting sense of overbearing the gardens. Currently the gardens offer oases of tranquillity and privacy from urban bustle, with a minimal sense of intrusion from the outside world. There is a very real risk these will be lost, in part because of the dominance of the proposed buildings but also because of the manner in which the service roads dissect the site and will bring vehicular movement deep into the gardens. It is absolutely fundamental that if the BZS truly want to deliver a legacy consistent with the principles it published, then it should commit to binding any future developer to the proposals

### Bristol Neighbourhood Planning Network

Comments: NPN is not a consultee at planning application stage

### Bristol Tree Forum 1 of 2

Date: 31 March 2023

22/02737/F | Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings. (Major)

“The trees at Bristol Zoo Gardens are some of the finest to be found in Bristol and are an exceptional collection that is nationally, and indeed internationally, important. There are dozens of individual trees in the Gardens that are noteworthy for their rarity, or as fine examples of their species. Several national 'Champion' trees have been recorded, and the collection as a whole is of immense value to the city for cultural, historic, and environmental reasons.” Paul Wood, author of London's Street Trees: A Field Guide to the Urban Forest.



## Further comments

The following comments are in addition to our earlier comments dated June 2021, and are in response to the publication on 24 March 2023 of Natural England’s Biodiversity Metric 4.0. 1 This revised metric (BNG 4.0) revolutionises the way urban trees are valued, making it clearer than ever that they are a very important habitat. This new model is likely to be given statutory force when the biodiversity elements of the 2021 Environment Act<sup>2</sup> take effect later this year.

### 1. The pending application

Natural England advises that: 'Users of previous versions of the Biodiversity Metric should continue to use that metric (unless requested to do otherwise by their client or consenting body) for the duration of the project it is being used for. This is because users may find that certain biodiversity unit values generated in biodiversity metric 4.0 will differ from those generated by earlier versions.' Given that the approach to valuing urban trees has fundamentally changed, we ask Bristol City Council, as the ‘consenting body’, to require the applicant to adopt this new methodology, if only for Individual Urban trees habitats. Our reasons are set out below.

### 2. Biodiversity net gain analysis

In our original comments, we argued that the Urban tree habitat area calculation methodology used by the applicant in its BNG 3.0 calculation (now updated<sup>3</sup>) is flawed and unworkable. We advocated for the use of the calculation method given in BNG 3.1, if only for its Urban tree habitat area calculations. However, we now contend that BNG 4.0 – and the Individual trees habitat methodology it advises – should be used, because it has reverted back to the methodology in BNG 3.0, except that the table it uses (see Table 8-1 below) has resolved these earlier issues.

Here is the new Individual trees habitat area measurement methodology used in BNG 4.0.

8.3.8. Once the size, number and condition of trees is known, assessors should generate an area equivalent value using the ‘Tree helper’ within the metric tool ‘Main menu’ (Figure 8-2). The ‘area equivalent’ is used to represent the area of Individual trees. This value is a representation of canopy biomass, and is based on the root protection area formula, derived from BS 5837:2012.

Tree helper						
Tree size	Number of trees and area (ha) for each condition state					
	Poor	Area	Moderate	Area	Good	Area
Small		0.0000		0.0000		0.0000
Medium		0.0000		0.0000		0.0000
Large		0.0000		0.0000		0.0000
Total	0	0.0000	0	0.0000	0	0.0000

**Figure 8-2 The tree helper embedded within the metric tool**

8.3.9. Table 8-1 sets out class sizes of trees and their area equivalent. For multi-stemmed trees the DBH of the largest stem in the cluster should be used to determine size class.

**Table 8-1 Tree size classes and area equivalents**

<b>Size class</b>	<b>Diameter at breast height (cm)</b>	<b>Metric RPA radius (m)</b>	<b>Metric area equivalent (ha)</b>
<b>Small</b>	greater than 7cm and less than or equal to 30cm	3.6	0.0041
<b>Medium</b>	greater than 30cm and less than or equal to 90cm	10.8	0.0366
<b>Large</b>	greater than 90cm	15.6	0.0764

Note: The correct metric equivalent area of Large category trees is 0.0765, not 0.0764.

This same approach applies to Individual trees habitats in groups or blocks:

8.3.12. Assessors should account for the size class (Table 8-1) of each Individual trees within a group or block. The number of Individual trees present within a group or block should be entered into the tree helper to calculate area equivalent. Do not reduce any area generated by the tree helper even if tree canopies overlap.

Adopting this methodology, we have amended our biodiversity net gain calculation as follows.

The applicant's biodiversity net gain report dated May 20225 is based on an assessment commenced in July 2021 and uses Biodiversity Metric 3.0 (BNG 3.0), the latest iteration of which (version 6) was published on 28 February 2023. Save for the comments made below, we have adopted the applicant's baseline and created habitat data, although we have recast it using BNG 4.0 Metric, because of its new rules for dealing with the irreplaceable veteran tree habitat.

### **3. Strategic significance**

We disagree with the applicant's use of Low strategic significance for all the habitat types. We have adopted a strategic significance of Medium for all the habitat types. Whilst the site is not formally identified in the Local Plan, it is nonetheless of significant ecological importance, both of itself and because is in a conservation area, is adjacent to the Clifton and Durdham Downs SNCI, is part of the wildlife corridor that connects the Downs with Avon Gorge; and it is within the IRZs of an SSSI and an SAC and within some 400 metres of Clifton Down Wood, an ancient woodland.

### **4. The urban tree habitat calculation**

The applicant relies on BNG 3.0. Our earlier comments set out why we say that, so far as Urban tree Habitat (now called Individual trees – Urban tree habitat) is concerned, the use of the BNG 3.0 methodology is infeasible because it is both error strewn and flawed.

Having set the RPA radius (r) multiplier to DBH x 15 for the veteran tree7 T083, we have adopted the new BNG 4.0 methodology and, using the applicant's AIA tree survey data, we calculate that the baseline habitat area of the Individual trees – Urban tree on site is 6.0086 hectares, of which 2.0901 hectares will be removed and 3.9185 hectares retained. We have assumed that the DBH of each of the trees in a group is as reported for that group in the AIA. This represents a loss of 42.5% of the trees and 34.8% of their habitat from the site.

We have adopted (though we do not agree) the applicant’s Moderate/Poor - 87.7% / 12.3% - condition proportions and calculate that these Individual trees – Urban tree habitats combined generate 49.62 baseline Habitat units (HUs), which is nearly 88.5% of the 56.09 on-site baseline biodiversity HUs.

5. Post-development Individual trees habitat area forecasting

The BNG 4.0 User Guide advises that any new tree planted will grow into a Small category tree at the end of the 'project timeframe'. This is likely to be 30 years by default, as per Part 1 s.9 of Schedule 14 of the 2021 Environment Act. This is the approach advised in the Guide:

8.3.13. Size classes for newly planted trees should be classified by a projected size

relevant to the project timeframe.

- most newly planted street trees should be categorised as ‘small’.
- evidence is required to justify the input of larger size classes.

8.3.14. When estimating the size of planted trees, consideration should be given to growth rate, which is determined by a wide range of factors, including tree vigour, geography, soil conditions, sunlight, precipitation levels and temperature.

8.3.15. Do not record natural size increases of pre-existing baseline trees within postdevelopment calculations.

If a larger Individual trees habitat area projection is proposed, this will need to be justified.

The evidence of tree growth rates is patchy at best - see the About section in our Tree Canopy Prediction tool. To overcome this, we have adopted the simple rule-of-thumb approach commonly used by arboriculturists and assume that a tree’s girth grows by one inch (2.54 cm) a year. We then apply this to the standard tree sizes adopted in BS 3961-1 -Nursery Stock Specification to Trees and Shrubs to calculate the eventual size of a tree 30 years after it has been planted. In all cases, save for semi-mature trees, the tree will be a BNG 4.0 Small category tree.

Here is the model we use:

British Standard BS 3936-1, Nursery Stock Specification for Trees and Shrubs					
Specification	Tree Girth	Lower (cm)	Upper (cm)	Median DBH (cm)	Estimated Age (yrs)
Light Standard (LS)	6-8cm	6	8	2.23	6
Standard (S)	8-10cm	8	10	2.86	7
Select Standard (SS)	10-12cm	10	12	3.50	8
Heavy Standard (HS)	12-14cm	12	14	4.14	9
Extra Heavy Standard (EHS)	14-16cm	14	16	4.77	10
Advanced Heavy Standard (AHS)	16-18cm	16	18	5.41	11
Semi mature	18 cm +	18	25	6.84	12

1" Annual Tree Growth (cm)	Girth (cm)	DBH (cm)	Project Timeframe (yrs)	DBH by Timeframe					
	2.54	0.8085	30	24.26					
<b>Urban Tree Habitat size 30 years after planting</b>									
Tree Size (BS 3961-1)	Planting DBH (cm)	Eventual DBH (cm)	RPA r (m)	RPA (sq m)	RPA (ha)	BNG 3.1 Size	BNG 4.0 Habitat (ha)	Difference (ha)	
Light Standard	2.23	26.5	3.2	31.7	0.0032	Small	0.0041	0.0009	
Standard	2.86	27.1	3.3	33.3	0.0033	Small	0.0041	0.0008	
Select Standard	3.5	27.8	3.3	34.8	0.0035	Small	0.0041	0.0006	
Heavy Standard	4.14	28.4	3.4	36.5	0.0036	Small	0.0041	0.0005	
Extra Heavy Standard	4.77	29.0	3.5	38.1	0.0038	Small	0.0041	0.0003	
Advanced Heavy Standard	5.41	29.7	3.6	39.8	0.0040	Small	0.0041	0.0001	
Semi-mature	6.84	31.1	3.7	43.7	0.0044	Medium	0.0366	0.0322	

The age of the tree being planted should not be 'credited' when calculating the time-to-target period. BNG 4.0 does not take account of annual mortality rates, which are high for urban trees. The applicant proposes planting 451 trees<sup>10</sup> (though their BNG 3.0 calculation reports 314 and their AIA reports 461) on site. We have assumed that these trees will be new Standard as per the tables above and that these will achieve a moderate condition after 30 years. We have allocated 0.0041 hectares per tree to be created, as required by BNG 4.0 (see para. 8.3.13 of the BNG 4.0 User Guide). 451 such trees will generate some 1.84 hectares of new Individual trees – Urban tree habitat and 6.18 HUs after 30 years.

Individual trees – Urban tree habitat created in private gardens must not be credited as part of the post-development BNG calculation:

8.3.7. Where private gardens are created, any tree planting within the created garden should not be included within post-development sheets of the metric. The habitat type 'Urban – Vegetated garden' should be used. However, even planting all the 451 trees proposed in publicly accessible locations will not replace the urban tree habitat lost and achieve the 10% net gain which we understand the applicant aspires to. We calculate that a further 923 BNG 3.0 trees (classified as Small category trees in BNG 3.1 & 4.0) would have to be planted to achieve a Moderate condition and provide the 3.76 hectares of new Individual trees – Urban tree habitat needed to generate the minimum 10% biodiversity net gain that will also be required when the Environment Act 2021 takes effect in late 2023.

Without these extra trees, the applicant's proposals will result in a net loss of biodiversity of 12.52%, not the net gain of 36.00% that they have calculated. We accept that a 376.35% net gain of Hedgerow units will be achieved by this proposal.

Here are the headline results for our calculation (a copy of our BNG 4.0 calculation, together the underlying baseline Individual trees – Urban tree habitat area calculation, has been provided):

Bristol Zoo Gardens		Return to results menu	
<b>Headline Results</b>			
Scroll down for final results ↴			
<b>On-site baseline</b>	Habitat units	56.09	
	Hedgerow units	0.57	
	Watercourse units	0.00	
<b>On-site post-intervention</b> <small>(Including habitat retention, creation &amp; enhancement)</small>	Habitat units	49.07	
	Hedgerow units	2.72	
	Watercourse units	0.00	
<b>On-site net change</b> <small>(units &amp; percentage)</small>	Habitat units	-7.02	-12.52%
	Hedgerow units	2.15	376.35%
	Watercourse units	0.00	0.00%
<b>On-site net gain is less than target set</b>			
<b>Off-site baseline</b>	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
<b>Off-site post-intervention</b> <small>(Including habitat retention, creation &amp; enhancement)</small>	Habitat units	12.64	
	Hedgerow units	0.00	
	Watercourse units	0.00	
<b>Off-site net change</b> <small>(units &amp; percentage)</small>	Habitat units	12.64	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
<b>Combined net unit change</b> <small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>	Habitat units	5.62	
	Hedgerow units	2.15	
	Watercourse units	0.00	
<b>Spatial risk multiplier (SRM) deductions</b>	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
<b>FINAL RESULTS</b>			
<b>Total net unit change</b> <small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>	Habitat units	5.62	
	Hedgerow units	2.15	
	Watercourse units	0.00	
<b>Total net % change</b> <small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>	Habitat units	10.01%	
	Hedgerow units	376.35%	
	Watercourse units	0.00%	
<b>Trading rules satisfied?</b>	Yes ✓		

## Bristol Tree Forum 2 of 2

Date: 29 Jun 2022

Bristol Zoo Gardens – introducing the site

Bristol Zoo Gardens was opened in 1836 and has been in continuous use ever since. It is the fifth-oldest zoo in the world and has an international reputation, not only for its animal collection but also for its tree and plant collections. This is what the zoo has said about the gardens:

The plant collections at Bristol Zoo Gardens (BZG) are surprisingly complex and serve a wide variety of functions. ... The plant collection(s) fulfil several functions in that they provide an attractive and immersive environment for zoo visitors, a setting for animals, and are used to put into practice mission-friendly environmental, conservation and education activities. The gardens are also a major attraction in their own right.

The gardens have a high reputation and through them we seek to engage with the local community and wider horticultural and botanical communities. We aim to contribute and comply with various national and international strategies, policies and guidelines to carry out its mission.

- BZG maintains a nationally recognised collection of plants including "Champion Trees" that are recorded on the National Tree Register. We maintain and manage National Conservation Collection of Plants and Gardens/Royal Horticultural Society plant collections e.g., Caryopteris and Hedychium.

- Our plant collections are used to help realise appropriate national initiatives such as the UK Plant Diversity Challenge and ISO14001 environmental standard. We also contribute to the work of the UK Plant Network and the Plant Working Group of the British and Irish Association of Zoos and Aquariums.

See also our request for the trees on the site to be protected with a Tree Preservation Order (TPO) at Appendix 1.

The Zoo Gardens are within the Clifton Conservation Area and immediately adjacent to the Clifton and Durdham Down SNCI (a Site of Nature Conservation Interest), which is also an Important Open Space (DM17), a Town and Village Green (TVG) and a Valuable Urban Landscape (DM17).

At its nearest point, the Zoo Gardens are within 200 metres the Avon Gorge Special Site of Scientific Interest (SSSI) and the Avon Gorge Woodlands Special Area of Conservation (SAC), and so well within their Impact Risk Zones (IRZ).

Our conclusions briefly stated

The future of the Bristol Zoo Gardens (BZG) site is in the hands of the Bristol, Clifton & West of England Zoological Society Ltd and its designs for redeveloping the site will be seen as its legacy. The Society's website lists five objectives within its strategic plan:

1. Saving wildlife
2. Engaging our public
3. Creating conservationists
4. Sustaining our environment
5. Sustaining our future.

To be credible, we believe that these objectives must inform all aspects of the work of the Zoological Society, including the qualities aspired to in this planning application.

This application, however, falls short in a number of areas (see pages 3-11 below for more detail):

1. The BZG is part of Bristol's heritage assets, its historical environment. The application needs to be considered in light of the National Planning Policy Framework (NPPF), paragraphs 189-202. This balances harm against public good. BCS22 and DM31 reinforce this and make it clear that 'proposals affecting locally important heritage assets should ensure they are conserved having regard to their significance and the degree of any harm or loss of significance.' These proposals will result in harm and the loss of the significance of this unique historic garden asset.
2. The BZG is within the impact risk zone of the adjacent SSSI and SAC and the Avon Gorge Ancient Woodlands. It is also immediately adjacent to the Durdham and Clifton Downs SNCI. This has not been addressed even though.
3. Of the 381 on-site trees, 162 will be removed. This is 42.5% of the trees growing in BZG, an unacceptable loss that is unlikely ever to be replaced in any meaningful way, not even under the Bristol Tree Replacement Standard (BTRS).
4. The plan to translocate 55 trees gives no details of the proposed translocation sites or mitigation proposals in the case of failure. Translocation is fraught with risk. This has not been addressed.

5. An unworkable version of the metric for Biodiversity Net Gain (BNG) has been used (BNG 3.0) for calculating Urban tree habitat. BNG 3.1 fixes this and should be used instead. This shows that the trees growing on the site account for over 70% of its biodiversity.
6. The calculation of baseline and newly created Urban tree habitat is given without explanation.
7. There is an assumption that only half the urban trees planted will reach full maturity. No explanation is given for this.
8. The wrong Strategic Importance parameter has been used. The location and importance of the site means it has medium strategic importance, not the low importance that the applicant has given it.
9. The BNG calculation fails to account for the likely delay in creating new habitat. In our calculation we have allowed for a three-year gap between the development starting and the new habitats being created.
10. The applicant's proposals will result in a net 22% loss of biodiversity rather than the 38.6% gain they have stated.
11. BNG submissions should include an inclusive management plan with a guarantee covering a period of thirty years including a financial budget and ecological monitoring. This has not been produced. For all these reasons, the applicant has failed to comply with the minimum requirements of the planning authority.

The planning context

See Appendix 2.

The application and the ways it falls short

Historical environment The Zoo Gardens form part of one of the key elements of Bristol's Historical Environment and, as such, falls to be considered under paragraphs 189 – 202 of the NPPF, BCS22 and DM31 (see Appendix 2). Whilst the zoo's animals can be relocated, the trees and gardens cannot.

They are as much a part of the zoo as its animals are.

The NPPF makes it clear that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.'

If there is substantial harm (or total loss of significance of the heritage asset), then paragraph 201 requires that 'local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss'. Alternatively, the application must demonstrate that all the criteria set out in paragraph 201 are satisfied. Even if it were shown that there would be less than substantial harm, that harm must still be weighed against the public benefits of the proposal.

The Bristol Core Strategy 22 (BCS22: Conservation and the Historic Environment) reflects this and aims to ensure that 'all new development safeguards or enhances the historic environment,' and that 'Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance, including gardens and Conservation areas.'

DM31 recognises that Heritage assets, which can range from whole landscapes to individual items of street furniture, are a finite non-renewable resource that can often be irreparably damaged by insensitive development. In particular, it requires that 'proposals affecting locally important heritage assets should



ensure they are conserved having regard to their significance and the degree of any harm or loss of significance.'

Development in conservation areas will be expected 'to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.' BZG is an essential element of the 'special character' of the Clifton Conservation Area.

The loss of the integrity of this historic garden asset, both by its fragmentation and as a result of the likely change of the ethos by which it is managed - from a botanical garden serving a serious scientific purpose to pleasure gardens ancillary to and managed for the particular benefit of those who live there – will result in 'harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting.'

We also understand that barely 25% of the gardens will be made accessible to the public, as opposed to the 100% they can now enjoy, albeit by paying an entry charge. Cars will also be able to access the site for the first time ever. Not only will this destroy the current amenity of the site, but it will also introduce a new source of pollution into the gardens that never existed before (save for service vehicles) and will damage the unique habitat and ecology of the site.

Paragraph 185 also requires that 'Planning policies and decisions should also ensure that new development is appropriate for its location ... as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.'

#### Tree survey and BTRS analysis

The applicant states that '80 trees, 31 groups/part groups and 3 hedges are proposed for removal as a result of this development.' Our analysis of the applicant's Arboricultural Report - Impact assessment and method statement<sup>4</sup> (AIA) records 393 trees – 218 individual trees and 175 in 45 groups. All bar 12 (T207 – T218) are on site.

It is proposed to retain all 24 retention category A trees as well as all of the 18 champion trees growing on the site, save for T015 (retention category B2), T017 (retention category U) and T180 (retention category U), which will be removed.

A further 55 trees will be transplanted<sup>5</sup>, though the new locations are not given. Tree transplantation is fraught with risk and has a significant failure rate. Many of the trees identified are mature or semi-mature, in fair condition and with at least 10 years of safe useful life expectancy. These risks should be factored into any mitigation or compensation proposals.

Of the 381 on-site trees, 162 will be removed (42.5%). These comprise 36 retention category<sup>6</sup> B trees, 138 retention category C trees and 7 retention category U Trees.

We calculate that, under the BTRS, 266 replacement trees would need to be planted to replace what will be lost (see Appendix 3). We have assumed that all the trees in a group have the same stem diameter (DBH) as is reported for that group in the AIA. We are uncertain how the applicant has calculated its BTRS figure.

In any event, the applicant plans to plant some 451 (the AIA says 461) trees on site, so no offsite planning will be required, whichever figure is accepted. A schedule of the proposed trees to be planted on site has been produced in 22\_02737\_F-SOFT\_LANDSCAPE\_KEY\_PLAN3236144.pdf.

#### Biodiversity net gain analysis

The applicant has produced a biodiversity net gain report dated May 2022.<sup>7</sup> It is based on assessment commenced in July 2021 and uses Biodiversity Metric 3.0 (BNG 3.0), though the calculation has not been produced. We have asked for it as certain key parameters upon which the report is based have not been reported – in particular, how the baseline and created areas of the Urban tree habitats have been calculated, how much habitat has been retained (there are no proposals to enhance existing habitats) and which Strategic Significance setting they have used. In the meantime, we have attempted to recreate it based on the Biodiversity Net Gain Report produced.

Nonetheless, we are prepared to accept the applicant's calculation subject to the following caveats:

#### 1. The appropriate BNG metric

Whilst the applicant relies on BNG 3.0, this has now been superseded by BNG 3.1. Nonetheless, save for the provisions relating to the treatment of Urban tree habitats discussed below, we accept their other BNG 3.0 calculations. We set out below our reasons for using BNG 3.1 in relation to Urban tree habitats – the corrected habitat size calculation and the new treatment of Urban trees under the Trading Rules.

#### 2. Strategic significance

The applicant appears to have used a Strategic Significance of Low strategic significance for all habitat types. We disagree, and we have adopted a Strategic Significance of Medium strategic significance for all habitat types. Whilst the site is not formally identified in the Local Plan, it is nonetheless of significant ecological importance, both of itself and because it is in a Conservation area, is immediately adjacent to the Clifton and Durdham Downs SNCI, is part of the wildlife corridor that connects the Downs with Avon Gorge and is within the IRZs of an SSSI and a SAC and within some 400 metres of Clifton Down Wood, an ancient woodland.

#### 3. Urban tree habitat calculation

The applicant's baseline calculation shows two Urban tree habitats – a Moderate condition area of 0.64 hectares and a Poor condition area of 0.09 hectares. No explanation is given as to how these two areas have been calculated.

The applicant relies on BNG 3.0, but the basis upon which the areas of Urban tree habitats are calculated in BNG 3.0 is flawed because the table produced at 7-2 of the BNG 3.0 User Guide is unusable. This is because it is impossible (save where a DBH exactly matches one of the three size categories given – 10cm, 30cm & 50cm) to allocate any given tree's DBH to any of the three size categories – Small, Medium, Large – that are listed (see Figure 1 below).

7.12 The area calculation for Urban trees is worked out using a Root Protection Area (RPA)<sup>49</sup> formula. The Urban tree helper uses the RPA to generate an area equivalent value. (See Table 7-2.)

**TABLE 7-2: Urban tree size by girth and their area equivalent**

Size	Diameter at Breast Height (cm)	Stem Diameter (cm)	RPA (radius in metres)	Area equivalent (ha)	No. of Trees equivalent to 1 ha
<b>Small</b>	30cm	10cm	1.2m	0.0005 ha	2,000 trees
<b>Medium</b>	90cm	30cm	3.6m	0.0041 ha	244 trees
<b>Large</b>	150cm	50cm	6 m	0.113	89 trees

*Figure 1 BNG 3.0 Table 7-2*

This has been rectified with the recent publication of BNG 3.1 which now gives this useable guidance for Urban tree habitat calculation (Figure 2 below):

## Calculating area

### Baseline

7.9. The area calculation for Urban trees is worked out using the Root Protection Area (RPA) (British Standards Institution, 2012)<sup>44</sup> formula  $\text{area} = \pi \times r^2$  where  $r$  is twelve times the tree's Diameter at Breast Height (DBH) for a single stemmed tree. For multi-stemmed trees the DBH of the largest stem in the cluster should be used to determine radius ( $r$ ).

- Where detailed measurements are available to the assessor, through an Arboricultural Impact Assessment (AIA) or similar, these measurements should be used to determine the area measurement for use with the biodiversity metric.
- The area of all trees within the project boundary should be accounted for, regardless whether a tree would require root protective measures or not.

---

<sup>44</sup> For more information see: THE BRITISH STANDARDS INSTITUTION (BSI) (2012) *Trees in relation to design, demolition and construction – recommendations* [online]. Available from: [British Standard 5837 2012 Trees in relation to design, demolition and construction](#)

Therefore, DBH values within AIA reports should be used to calculate area values for use with the metric (rather than RPA's prescribed by the AIA).

7.10. In the absence of detailed measurements, the 'Urban tree helper' may be used to generate an area equivalent RPA value (for example, at project scoping prior to detailed survey). The urban tree helper is found within the 'Main menu' of the metric tool. Table 7-2 sets out class sizes of Urban tree sizes, and area equivalent (for input into the metric tool).

Figure 2 The approach to use when calculating Urban tree habitat (see Figure 2 below for Table 7-2)

Save that we have set the RPA radius ( $r$ ) multiplier to  $\text{DBH} \times 15$  for the veteran tree<sup>10</sup>, T083, we have adopted this approach and, using the applicant's AIA, calculate that the baseline habitat area of the trees on site is 1.99 hectares, of which 1.64 hectares will be removed and 0.3456 hectares retained. We have assumed that the DBH of each of the trees in a group is as reported for that group in the AIA.

We have, for convenience (though we do not accept that this almost unique collection of trees justifies such low scores), adopted the Moderate/Poor - 87.7% / 12.3% - condition proportions adopted by the applicant and calculate that, taken together, these Urban tree habitats generate 16.44 habitat units, which is 72% of all the biodiversity found on site.

#### 4. Urban tree habitat creation

The applicant proposes the following for Urban tree habitat creation:

Urban – Urban Trees

3.20 Circa 314 urban trees are to be planted as part of the proposals, of which it has been assumed half will reach full maturity. It is assumed that **Moderate condition** can be achieved as many of the species to be planted should reach maturity in 27 years (pass criteria 3) and that a continuous canopy can be formed (pass criteria 2). It has also been assumed that 80% of trees have reached medium size by 27 years (the other 20% being small).

Figure 3 Proposed Urban tree habitat creation

Save that the applicant’s soft landscaping plan<sup>12</sup> identifies 451 trees to be planted on site, why is it suggested that only half will reach full maturity? Will the other half not survive? Also, the drawings produced do not suggest that most of the trees to be planted will achieve ‘a continuous canopy’. Furthermore, we do not understand how the applicant has calculated that 0.53 hectares of new habitat will be created. We have adopted a different methodology for new habitat creation, using BNG 3.1, as set out in Figure 4 below:

**TABLE 7-2: Urban tree size classes and their area equivalent**

Size class	Diameter at breast height (cm)	Metric RPA radius (m)	Metric area equivalent (ha)
Small	≤ 30cm	3.6m	0.0041 ha
Medium	> 30 to ≤ 90cm	10.8m	0.0366 ha
Large	> 90cm	15.6m	0.0764 ha

Post-development

- 7.11. When calculating the area for newly planted Urban trees Table 7-2 should be used. Size classes for newly planted trees should be classified by projected size at 30 years from planting.
- 7.12. When determining post-development changes to rural hedgerows and lines of trees recorded in the baseline (see Chapter 8) these should not be entered post-development as linear blocks of Urban trees. This is to satisfy trading rules.

Figure 4 The methodology for creating new Urban tree habitat

We have adopted the approach set out in paragraph 7.11 and, using the new version of Table 7-2, have calculated that a Standard stock tree<sup>13</sup> planted today will have grown into a BNG 3.1 Small category (BNG 3.0 Medium category) tree at the end of 30 years.<sup>14</sup>

The BNG 3.1 Trading Rules also state:

### Trading Rules

7.8. The mitigation hierarchy and trading rules apply to Urban trees. Given Urban trees are a 'Medium' distinctiveness habitat trading rules stipulate that the same broad habitat type (or a higher distinctiveness habitat) is required. However, given the important ecosystem services value provided by trees, where possible 'like for like' compensation is the preferred approach (i.e. where possible any loss of Urban trees should be replaced by Urban trees - rather than other urban habitats).

*Figure 5 BNG 3.1 Trading Rules*

The applicant proposes planting 451 Urban trees<sup>15</sup> (though Figure 3 reports 314 and the AIA reports 461) on site. No tree planting schedule has been produced, but we have assumed that these will be new Standard trees, which will achieve a moderate condition after 30 years. We have allocated 0.0041 hectares per tree to be created, as required by BNG 3.1 (Figure 3 above). 451 such trees will generate 1.84 hectares of urban tree habitat after 30 years.

We have also factored in an extra three years to allow for the delay in planting these trees whilst the site is developed. This reduces the final time to target multiplier for the creation of this new Urban tree habitat from 0.382 to 0.343.

However, even planting 451 trees will not replace the Urban tree habitat lost plus 10% net gain, which the Trading Rules advise should be replaced like-for-like (Figure 4 above). We calculate, having factored in a three-year delay between the habitat being removed and eventually replaced, that a total of 1,055 BNG 3.0 Medium category trees would have to be planted to achieve a moderate condition and provide the 4.29 hectares of new Urban tree habitat needed to generate the minimum 10% biodiversity net gain that will be required when the Environment Act 2021 takes effect in late 2023 and which, we believe, the applicant aspires to.

Without these extra trees, the applicant's proposals will result in a net loss of biodiversity of 22.24%, not the net gain of 38.66% that they have calculated.

Figure 6 below shows the headline results for our calculation (a copy is available on request):

Bristol Zoo Gardens		Return to results menu	
Headline Results			
<b>On-site baseline</b>	Habitat units	22.90	
	Hedgerow units	0.57	
	River units	0.00	
<b>On-site post-intervention</b> <small>(Including habitat retention, creation &amp; enhancement)</small>	Habitat units	17.81	
	Hedgerow units	2.69	
	River units	0.00	
<b>On-site net % change</b> <small>(Including habitat retention, creation &amp; enhancement)</small>	Habitat units	-22.24%	
	Hedgerow units	369.91%	
	River units	0.00%	
<b>Off-site baseline</b>	Habitat units	0.00	
	Hedgerow units	0.00	
	River units	0.00	
<b>Off-site post-intervention</b> <small>(Including habitat retention, creation &amp; enhancement)</small>	Habitat units	0.00	
	Hedgerow units	0.00	
	River units	0.00	
<b>Total net unit change</b> <small>(including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>	Habitat units	-5.09	
	Hedgerow units	2.12	
	River units	0.00	
<b>Total on-site net % change plus off-site surplus</b> <small>(including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>	Habitat units	-22.24%	
	Hedgerow units	369.91%	
	River units	0.00%	
<b>Trading rules Satisfied?</b>	<b>No - Check Trading Summary</b>		

Figure 6 BNG Metric 3.0 calculation headline results

## 5. Bristol LPA guidance on BNG

The latest guidance we have seen from Bristol LPA on the requirements for biodiversity net gain is as follows:

“Ecological mitigation is required to meet the requirements of the National Planning Policy Framework (NPPF). The National Planning Policy Framework (2019) states in paragraph 170(d) on page 49 that planning decisions should minimise impacts on and provide net gains for biodiversity. It is recommended that the proposal employs Defra / Natural England’s Biodiversity Net Gain (BNG) biodiversity metric 2.0 (as updated) to develop ecological mitigation proposals. The BNG assessment should be undertaken prior to the validation of a future planning application and not conditioned. Planning applications submitted to Bristol City Council should demonstrate a positive biodiversity gain when using this metric. Please note that this may require off-site mitigation to achieve a Biodiversity Net Gain. Applicants should provide full details of their data, measurements and workings used to calculate the percentage BNG. Engagement with the Council’s pre-application process to inform BNG proposals and the design of ecological mitigation proposals at an early stage is encouraged. The Defra Biodiversity Net Gain (BNG) Biodiversity Metric 2.0 includes an off-site module which is fully integrated within the methodology. If a positive on-site BNG score cannot be achieved, the off-site module should be used as the automatic next step to achieve a positive BNG score. A financial contribution is not an acceptable way forward because it does not calculate biodiversity units and so will be an arbitrary figure that will be very difficult to calculate or justify. All BNG submissions should be accompanied by a nature conservation and landscape management plan which addresses features of interest, objectives, management compartments and prescriptions, a

work schedule including a thirty year annual work plan, resourcing including a financial budget and ecological monitoring. This should cover a 30 year period. Please note that if the Environment Bill is passed, a future planning application will be required to demonstrate a mandatory minimum 10% Biodiversity Net Gain as measured using the Defra Biodiversity Metric 2.0 (as amended).”

Save that the relevant paragraph in the NPPF (2021) is now 174 d)17 , that the current biodiversity net gain metric is BNG 3.1 and that the Environment Act 2021 is now law, and the mandatory minimum 10% Biodiversity Net Gain will take effect next year, this guidance still applies.

On our analysis, the applicant has failed to ‘provide net gains for biodiversity’ or to ‘demonstrate a positive biodiversity gain when using this metric.’

The applicant also proposes that ‘management prescriptions to establish habitats at (or above) their required condition is detailed within a Landscape and Ecological Management Plan (LEMP), secured by an appropriately worded planning condition.’ However, the guidance above states that ‘all BNG submissions should be accompanied by a nature conservation and landscape management plan which addresses features of interest, objectives, management compartments and prescriptions, a work schedule including a thirty year annual work plan, resourcing including a financial budget and ecological monitoring. This should cover a 30 year period.’ This cannot be ‘secured by an appropriately worded planning condition’ to be prepared at a later date nor be limited to just 27 years.

For all the reasons set out above, the applicant has failed to comply with the minimum requirements of the planning authority and its application must therefore be refused.

Appendices included within these comments are available to view on the website, and includes a written request to TPO trees at Bristol Zoo Gardens from Bristol Tree forum (June 2021), a discussion of the relevant planning context, and Bristol Tree Replacement Standard Calculations.

#### **Bristol Waste Company 1 of 2**

Address: Bristol Waste Company Limited, Albert Road, Bristol BS2 0XA

Comments

Dear Case Officer,

I have sent a separate email to you regarding this major development as it contains tables difficult to replicate on a text response.

Regards

Peter Hall, Bristol Waste Company

#### **Bristol Waste Company 2 of 2**

Dear Case Officer, Following a review of the documentation, Bristol Waste has considered the waste and recycling provision for the development at Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA. For 164 residential flats at 8 blocks we would recommend that the following waste and recycling provision is allowed for:



Building	Apartments	Plastics / Cans	Size litres	Glass	Size litres	Paper	Size litres	Card	Size litres	Food Waste	Size litres	Refuse	Size litres	# bins per store
N1	7	1	360	1	240	1	240	1	1100	1	140	1	660	6
N2	15	2	360	1	240	1	240	1	1100	1	140	1	1100	7
N3	43	2	1100	2	240	1	240	2	1100	2	140	3	1100	12
E1	20	1	1100	1	240	1	240	1	1100	1	140	2	1 x 660 & 1 x 1100	7
CTR	12	2	360	1	240	1	240	1	1100	1	140	1	1100	7
E2	12	2	360	1	240	1	240	1	1100	1	140	1	1100	7
E3	24	1	1100	1	240	1	240	1	1100	1	140	2	1100	7
S1	31	2	1100	1	240	1	240	2	1100	1	140	2	1100	9
Weekly collection		Refuse, Card & Food												
Alternate weekly TBC		Plastics / Cans, Paper & Glass												

The container numbers on page 71 of the design & access statement do not clearly break down the types, numbers, and volumes of bins for each store. The updated guidance notes do give more detail, but the developer must not assume dry recycled material is comingled or that all collections are weekly. For each of 37 residential houses we would provide the following suite of bins.

Container	Volume (litres)	Width (mm)	Depth (mm)	Height (mm)
Refuse bin	180	465	740	1070
Blue bag	90	450	450	450
Green recycling box	55	585	390	350
Black recycling box	45	585	390	285
Food waste bin	23	320	400	405
Kitchen caddy*	5	250	205	205

We

would urge at this stage of the planning process that the developers refer to the Planning Guidance for Waste and Recycling produced by Bristol Waste Company. When considering the layout, access and the design of the bin stores, this guide contains a wealth of information regarding the bin volumes, requirements etc.

<https://www.bristol.gov.uk/documents/20182/239427/Waste+%26+Recycle+booklet.pdf/6d2822d9-9b14-40f1-8f85-0a47b20d5ce9?SF=031>

Bristol Waste vehicles will only collect from adopted highways. Any collections from private roadways would be by agreement with Bristol Waste and may need a covering letter of indemnity. I hope that this has provided sufficient feedback with regards to the areas of concern should this development progress from as proposed. Please note that the above comments are made on the basis and the quality of the information received to date and as such, they are made without prejudice to any further pre-application or application proposals which may raise further detailed questions or matters that are not currently considered within this response.

Thank you, Peter Hall Innovation & Sustainability Project Coordinator

## Building Bristol - Employment and Skills

Date: 11<sup>th</sup> July 2022

Building Bristol are happy with the content of the employment and skills statement supplied by the applicant. This statement acknowledges the requirement for an employment and skills plan and the applicant has committed to ensure this is passed onto the developer when appointed. This requirement will be listed as a pre-commencement condition. Building Bristol would welcome early engagement with the developer, when appointed, to support them in providing a clearly defined Employment and Skills strategy.

Date 06<sup>th</sup> December 2022

Building Bristol acknowledge the Employment and Skills statement submitted by the applicant committing to the use of a local employment and skills plan.

Should permission be granted please ensure the following Pre-Commencement condition is included in the decision and that the £2000 Section 106 obligation fee is collected.

#### Employment and Skills Plan (ESP) Construction Phase

No development shall take place including any works of demolition until a Construction Phase ESP is submitted to and approved by the Local Planning Authority. The ESP is to be in conformity with the Building Bristol Guidance [www.buildingbristol.com](http://www.buildingbristol.com) and will aim to maximise training and employment opportunities for local residents available during the construction phase of the development. The development shall thereafter be carried out in accordance with the approved ESP unless a variation in the plan is agreed in writing in advance by the Local Planning Authority.

Reason: In recognition of the employment opportunities offered by the construction phase of the development

#### Building Safety and Construction Division (HSE)

Date: 4<sup>th</sup> November 2022

Good Afternoon,

Thank you for your email.

In regards to your query, we previously informed you that as the case is under 18 metres we will not be providing comments on this case.

Kind Regards

Ethan Fakir

Operational Support,

Building Safety and Construction Division

#### Clifton and Hotwells Improvement Society 1 of 3

Date: 28<sup>th</sup> June 2022

Comments: The Clifton & Hotwells Improvement Society strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable in their current form.

The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape and skyscape of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique.

Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely ignored.

The following points summarise some of the most blatantly pernicious aspects of the proposals :

1. 201 dwellings represents a massively over-dense development of the site.
2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest.

3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the six storey block on the northern boundary.

4. The proposed terracing is not appropriate in this area.

5. The loss of trees will be compounded by the inevitable damage to the root systems of many other trees by infrastructure work.

We urge rejection of this highly damaging Application which, far from leaving a worthy legacy, would irrevocably damage one of the finest sites in Bristol.

### Clifton and Hotwells Improvement Society 2 of 3

Date: 4<sup>th</sup> December 2022

The following represents a slightly revised version of the comments originally posted on August 7th.

CHIS strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable.

The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape, and skyscape of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique.

Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely ignored.

The following points summarise some of the most blatantly pernicious aspects of the proposals :

1. 196 dwellings represents a massively over-dense development of the site.

2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest.

3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the block on the northern boundary,

4. The proposed terracing is not appropriate in this area.

5. The loss of trees will be compounded by the inevitable damage to the roof systems of many other trees by infrastructure work.

We urge rejection of this highly damaging Application.

### Clifton and Hotwells Improvement Society 3 of 3

Date: 23<sup>rd</sup> January 2023

The minor modifications recently made to this Application entirely fail to address the concerns of CHIS who consider it to be clearly contrary to BCS 22. It represents an over-intense and overbearing development which would, without reasonable justification, adversely affect the character of this part of the Clifton Conservation Area and the setting of its listed buildings.

Our views are entirely in line with those of Bristol City Council's Conservation Advisory Panel of which CHIS is a member and whose letter of 20 November 2022 sets out in some detail the architectural poverty of the scheme and its detrimental impact on heritage assets.

### Clifton College 1 of 4

Date: 22<sup>nd</sup> July 2022

Dear Case Officer

Response to Planning Application Reference 22/02737/F at Bristol Zoo Gardens, Bristol, BS8 3HA  
Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings.

#### Introduction

Clifton College and the Bristol Zoo Gardens ('BZG') have existed side by side since 1862 and are both identified as defining features within the Clifton and Hotwells Conservation Area Appraisal. Clifton College is the most significant neighbour of the BZG with a number of school buildings on Guthrie Road, Northcote Road and College Road. Clifton College provides education for 1,300 pupils across the Nursery, Pre-Prep, Prep and Upper Schools. In addition to being a significant landowner in the vicinity of the BZG, Clifton College are also a major employer with 700 people employed in the local area.

As long-standing members and neighbours of the Bristol Zoological Society ('BZS'), Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however as an operational school with an overall responsibility for the safeguarding of its pupils the planning application raises a number of significant concerns for Clifton College which this letter addresses.

#### Engagement with BZS to Date

Representatives from Clifton College attended the public consultation events that took place in August/Sept 2021, November 2021 and March 2022 as well the wider Community Forum alongside local residents. Following the November 2021 public consultation, Clifton College raised a number of significant concerns directly with the BZS which included concerns in relation to safeguarding and overlooking into sensitive school buildings and grounds, highways safety, daylight/sunlight and heritage impacts. These concerns remained following the March 2022 consultation and it was requested that a further meeting between Clifton College and the BZS be held prior to the submission of the planning application. Clifton College met with the BZS team to discuss these concerns directly on the 9th June 2022 following the submission of the planning application. These concerns remain within the submitted planning application.

## Key Concerns

### Highways Safety

Clifton College has an overall responsibility for the safeguarding and safety of its pupils and has a particular concern in relation to highways safety. Clifton College has instructed Highgate Transportation consultants to review the planning application from a highways perspective. A technical note summarising their concerns is appended to this letter. An overriding concern is that the presence of a large operational school with children ranging from nursery age through to sixth form pupils on the boundaries of the BZG appears to have been given limited attention within the submitted Transport Assessment.

The College buildings are spread across an area that is intersected by six different roads. The operating functions of the College require significant movement of children of all ages, but predominantly those aged 11-18, without direct adult supervision, along and across College Road, Guthrie Road, Northcote Road and The Avenue, throughout the day and into the early evening, as they move between lessons and activities. As the College provides accommodation for around 350 boarding pupils, these movements extend to 9pm as pupils visit the sports centre, library and dining halls.

There are significant concerns in relation to the proposed access and circulation patterns associated with the masterplan. The proposed vehicular access points on Guthrie Road and at the top of Northcote Road directly conflicts with the access points for the College and the movement patterns of children. These roads at present are mainly used by Clifton College staff, pupils and parents rather than for general traffic movements. As noted above throughout the school day there are regular pedestrian movements of children as they move between lessons and between sites. There are particular concerns around conflicts at drop off and pick up times. The potential conflicts with the new access points are a significant safety concern particularly for some of the College's youngest pupils who are currently dropped off along Northcote Road.

There are also concerns in relation to the lack of road safety audits and in relation to the compliance of the parking surveys with Bristol City Council's guidance.

The coaches that Clifton College uses to transport its pupils to its sports ground in Leigh Woods park along Guthrie Road on a daily basis, in a location consistent with the location for the BZG coach parking. Any forthcoming Traffic Regulation Order ('TRO') amendment to the highway will need to consider the existing coach parking and the College's drop off and pickup requirements. Clifton College would resist a TRO which would significantly impact upon the existing operations of the College.

The attached Highgate Transportation Technical Note fully details the concerns of Clifton College from a highway safety perspective which we wish BCC to be aware of.

### Safeguarding, Privacy and Overlooking

In relation to safeguarding there are significant concerns around the overlooking impacts of the proposed buildings into various sensitive College buildings, play areas and College grounds along both Guthrie Road and Northcote Road. Northcote Road in particular predominately houses the Preparatory School and the College's youngest pupils.

As an example, proposed building E3 to be sited at the corner of Guthrie Road and Northcote Road is located directly opposite Poole's House which houses prep school children aged 9-13 and also looks directly into the sports hall on Guthrie Road. The first floor podium garden and the balconies and terraces on the upper floors are a particular concern as these would look directly into these sensitive College buildings.

There is also overlooking from the proposed new building S1 on Guthrie Road into the South Town Day house and the Watson's Boarding house which house pupils in the Upper School.

The new pedestrian route between the new Building S1 and the Joseph Cooper Music school is also a concern. This new pedestrian route would bring pedestrians along a narrow path which has windows immediately onto the path within both the Joseph Cooper Music School and the new Building S1. Clifton College queries whether this route is necessary given there is a new pedestrian access point at the main gates on Guthrie Road. There is also an overlooking concern with the windows at the eastern end of the Joseph Cooper Music School and the windows at the western end of the new Building S1 looking directly onto each other in addition the overlooking potential and privacy issues arising from the new pedestrian route.

#### Daylight / Sunlight

We have reviewed the Daylight/Sunlight Report submitted in support of the application in relation to the impacts on the surrounding Clifton College buildings. Clifton College is concerned that there will be a reduction of the daylight/sunlight within a significant number of its buildings. Additionally there is no reference to potential design mitigations within the submitted report to address these impacts.

In relation to Poole's House on Northcote Road, the report identifies that 35% of windows would fail to meet the VSC guidelines and 25% would fail the NSI guidelines. It is noted within the report that 4 rooms located at lower ground level have the potential to receive a medium to high reduction in daylight levels (under the NSI measurement). The report notes that these are not believed to serve habitable rooms. Clifton College can confirm that these rooms are habitable rooms used as dining, social and study spaces. These are all used throughout the day and evening and therefore impacts on their daylight/sunlight is a material consideration which needs to be addressed.

It is also notable that for the South Town building (a boarding house on Guthrie Road) the report states that this building will have the highest amount of windows that will fall below the BRE recommendations. The report notes that this building is used as an events space, however this is a boarding house and therefore it is sensitive to this loss of light. The rooms on Guthrie Road include bedrooms for pupils and staff living within the building.

Finally, the Daylight and Sunlight Report does not assess the impact of the proposals on the existing play areas and amenity spaces that surround the site. The impact on these should also be assessed. Clifton College reserves the right to comment further on the daylight/sunlight position at later point during the determination of the planning application.

#### Heritage

Clifton College are the guardians of a significant number of heritage assets which includes locally listed and listed buildings, important open spaces, as well the Clifton College Local Historic Park and Garden which also has a protected view crossing over it (View LC24 as identified within the Conservation Area Appraisal). The Conservation Area Appraisal also notes that Clifton College is a

crucial landmark nationally and within Bristol. Clifton College is concerned that this sensitive heritage context has not been fully considered and appreciated within the planning application and within the submitted Townscape and Heritage Statements.

Christopher Balme Conservation has been instructed to review the planning application on behalf of Clifton College. The submitted Heritage Statement considers that the 'the introduction of bespoke, bold architecture into this historically separate and different site will have negligible impact to the setting of the listed buildings of Clifton College, nor to its locally-listed buildings along Guthrie, College and Northcote Roads.'

This is not correct, it is considered the scheme will have a significant impact on the setting of Heritage Assets. The proposed five storey, flat roofed, perimeter blocks would be a stark juxtaposition against the variety of Clifton College buildings and residential buildings that surround the site. The predominance of 'bold architecture' that does not respond to the context cannot be considered neutral.

Furthermore, the submitted Townscape Appraisal does not provide a clear overview of the views within the area as a comparison against the existing situation and therefore it is difficult to fully appreciate the impact the proposals will have on the character and appearance of the Conservation Area. To fully appreciate the impact on the setting of the Clifton College Listed and Locally Listed buildings it is important that the impact of the proposals within the setting of these buildings is fully considered. In particular the view across the Close Playing Fields towards the Clifton College buildings should be produced in order to confirm whether the BZG proposals are visible within the setting and backdrop of these important buildings. Clifton College has asked the BZS team if this view can be produced.

Clifton College reserve the right to comment further on the above heritage concerns during the determination of the planning application.

#### Design Concerns

Clifton College considers that the form and scale of the proposed buildings around the perimeter of the site are not sympathetic to the surrounding historic buildings. The scale and massing of the new buildings is also out of keeping with the surrounding buildings and townscape. In particular the scale of the 5 storey buildings along Northcote Road is not appropriate in comparison to the more modest scale of the adjacent Clifton College buildings which are generally 2 to 3 storeys in height . In addition the proposals will introduce the 4 storey Building S1 adjacent to the much lower rise Joseph Cooper Music School which is also locally listed.

Clifton College is concerned that the proposed perimeter buildings fail to conform to Policy DM26: Local Character and Distinctiveness, of the adopted Site Allocations and Development Management Policies Local Plan (2014). In particular it is considered that the proposals do not respond appropriately to the height, scale, massing, shape, form and proportion of existing buildings, skylines and roofscapes. It is considered that the proposals fail to reflect locally characteristic architectural styles, rhythms, patterns, features and themes taking account of their scale and proportions.

#### Demolition of the Conservation Education Centre

This building on Guthrie Road was only recently refurbished and extended. Clifton College questions the sustainability of demolishing a recently developed building and whether it would be more

appropriate to retain this in education use which would require minimal works given the existing use of the building.

#### Construction Impact

Clifton College is concerned around the construction impacts on its day to day operations as an existing school. In relation to the impacts of construction deliveries there is a highways safety concern as its pupils move between lessons on the surrounding streets. Construction noise is also a particular concern given the need for quiet to teach, conduct music lessons and to conduct examinations. Clifton College requests that it is consulted on any future Construction Environment Management Plan (CEMP) and Construction Method Statement (CMS) before it is approved by the Council so that its activities can be considered in the development of these documents.

#### Summary

As long-standing members and neighbours of the BZS, Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however Clifton College has significant concerns relating to the impact of the proposals as set out in this letter which will have a lasting detrimental impact on the College. We trust these comments will be taken on board by the Council in the determination of this planning application and

Htp/2250/TN/01/A Page 1 of 6

Highgate Transportation Ltd

First Floor, 43-45 Park Street, BRISTOL BS1 5NL

Company Registration Number: 07500534

TECHNICAL NOTE

PROJECT: Reps on behalf of Clifton College for Application 22/02737/F

REPORT: 2250/TN/01/A – Technical Note

DATE: July 2022

1. The focus of this report is to review the methodology outlined in the submitted transport assessment work to ensure that it is clear and robust.
2. It is considered that the largest omission in the transport assessment work is the lack of acknowledgement that Clifton College is located on at least two boundaries of the site, with students from nursery through to sixth form regularly walking (or being transported) to and from the various buildings on Northcote Road and Guthrie Road. These well-used desire lines associated with student movements are also ignored within the assessment.
3. The other two main issues that require resolution are:
  - i. The need for a Road Safety Audit Stage 1 to be provided regarding the proposed changes to the public highway arising from the new accesses and associated works, to ensure that confidence can be placed in the proposals at this full planning application stage.
  - ii. The non-compliant parking surveys need to be revised in accordance with the published Bristol City Council Parking Methodology.
4. These issues will be addressed in this report.

#### Background

5. An application (ref: 22/02737/F) has been validated on 13th June 2022 for the redevelopment of Bristol Zoo Gardens (BZG). The proposals include:

Page | 44



- i. 201 residential units (Class C3)
  - ii. the provision of community floorspace (Class E, F1 and F2)
  - iii. open space with associated landscaping
  - iv. play space
  - v. parking
  - vi. accesses (pedestrian, cycle and vehicular)
  - vii. infrastructure
  - viii. works to listed buildings
  - ix. selective demolition of buildings
6. The application was supported by a Transport Assessment and Travel Plan.

7. Clifton College is a day and boarding private school within Clifton, with the prep and upper school wrapping around the Zoo site. The operating functions of the school require significant movement of students of all ages, but predominantly those aged 11-18, without direct adult supervision, along and across College Road, Guthrie Road, Northcote Road and The Avenue, throughout the day and into the early evening, as they move between lessons and activities. As the College provides accommodation for around 350 boarding pupils, these movements extend to 2100 hours as pupils visit the sports centre, library and dining halls.

#### Traffic Generation

8. The submitted Transport Assessment sets out that compared to the existing BZG traffic generation, the forecast traffic generation from the redevelopment would be less and therefore there is a net traffic benefit of the scheme compared to the existing use of the site.

9. However, this does not take into account that the majority of vehicles associated with the BZG would be accessing the car parks on the A4176 and the overflow car parks accessed via Lady's Mile, rather than travelling on Guthrie Road and Northcote Road, where there is currently no access for BZG.

10. Therefore, this statement does not account for the increase of traffic on Guthrie Road and Northcote Road associated with the new vehicular accesses and the resultant increase in conflict between pedestrian and vehicle movements in this location, to the detriment of highway safety.

11. Furthermore, the proposed residential development peak hour traffic is likely to be 0800-0900 and 1700-1800. Given that the school operational hours are 0700-2100 with day pupils arriving between 0800-0900 and the majority leaving between 1600-1800, this will conflict with the vehicular movements of the residential aspects of the redevelopment (201 units; 118 parking spaces allocated), to the detriment of highway safety.

12. The transport assessment work cannot rely on the statement that "it is expected that many of the residents would be retired and so not exiting the site at peak times", given that the units proposed are not part of a retirement complex. This calls into question the validity of the transport assessment work.

#### College Road Access

13. The main site access is proposed as a new priority access arrangement to be provided on College Road, immediately south of the existing priority junction with Cecil Road i.e. a new staggered crossroad junction.

14. Given that this is a Full planning application, to include for access, this arrangement should have been supported by a Road Safety Audit Stage 1 to give the Council confidence that the provision of this access can be relied on, including confirmation of the acceptability of the swept path analysis and visibility splays provided.

#### Northcote Road Northern Vehicular Access

15. This new two-way vehicular access will be gated and closed at all times, opened with a fob and will be for resident access only. The access will be 4.8 metres wide and will allow two-way movements for cars (and cycles), with a pedestrian access immediately north, which will also be gated.

16. The vehicular access gate is to be set back 8.0 metres from the highway. The Transport Assessment sets out that this will allow one car to wait clear of the highway whilst waiting to enter through the opening gates, and that this would not impact the flow of vehicles on Northcote Road.

17. However, if two or more vehicles were to be waiting to enter the site, the second vehicle will be within the highway, therefore impacting the flow of vehicles on Northcote Road, and given that Northcote Road is a one-way road heading north, all vehicles waiting to access will be within close proximity to the school on the eastern side of the carriageway. No analysis has been carried out to confirm the likelihood of such an event occurring.

18. Furthermore, no Road Safety Audit Stage 1 has been carried out to give the Council confidence that the provision of this new access arrangement can be relied on.

#### Guthrie Road

19. The existing gated access on Guthrie Road is not currently in use. The access is directly opposite the Clifton College minibuss car park.

20. It is proposed to utilise the existing gated access with cars having entry-only and cycles with two-way access. The width of the existing gates is 3.36 metres. This width is not suitably wide enough for a car and cycle to safely pass. Therefore, if a cyclist is exiting the development, a car will have to wait across the footway for the cyclist to emerge. This is therefore a highway safety issue and could result in conflict with pedestrians, especially school children, using the footway. This could also result in cycle/ vehicle conflict should they meet at the access. Again, no Road Safety Audit has been carried out to give confidence to this proposal.

#### Delivery Vehicles

21. It was noted from the recent meeting minutes between Clifton College and BZG that there is expected to be a concierge service to take deliveries. If this is implemented, and it is not clear that delivery vehicles cannot enter the development from Guthrie Road and Northcote Road, delivery vehicles are likely to circulate the outside of the development to find the correct unit.

22. Furthermore, given there is pedestrian access for staff/ deliveries/ maintenance from Guthrie Road, would this encourage the associated vehicles to wait on Guthrie Road –taking up on street parking and/or parking on double yellow lines. This has potential implications for Clifton College coach parking.

#### Parking

23. We do not agree with the statement that future residents of the development not being able to apply for a resident's parking permit removes the potential impact of overspill parking from occurring on a daily basis.

24. There is nothing stopping resident's owning a vehicle and parking it on street and using the pay and display between the hours of 0900 and 1700 Monday to Friday and feeding the meter, or parking only outside those times.

25. Therefore, we consider, as set out in the following paragraphs, that parking demand and impact on on-street parking has been underestimated and there is a lack of evidence to demonstrate that this has been assessed appropriately.

#### Visitor Parking

26. Regarding accommodating proposed visitor parking, the Transport Assessment summarises the following:

“Visitor car parking is proposed to be on-street making use of the existing pay and display bays. Parking surveys have identified that there is a significant amount of available on-street parking in the evenings, and the available on street parking during the day would increase once BZG has closed. Therefore making use of the existing available parking for visitors rather than providing new visitor parking is the most sustainable approach to visitor parking provision. This approach has been agreed with BCC highways officers.”

27. There is no quantifiable data included in the Transport Assessment to confirm that this is achievable.

28. We have concerns that the lack of detailed assessment on parking pressure has underestimated on street parking demand arising from the proposals (as well as the adjacent application for the residential redevelopment of West Car Park on College Road). This would lead to on street parking pressure issues and therefore an increase in vehicle movements as drivers circulate around the local roads looking for a parking space, resulting in an increased risk to pedestrian safety.

29. Furthermore, given the proposals require a review of the current Residential Parking Scheme (RPS) TRO in operation, and the future residents of the scheme will not be entitled to RPS permits, there is no guarantee that there will be enough on-street parking for visitors as this has not been quantified.

#### Parking Survey

30. The parking survey information provided is not sufficient or robust.

31. BCC guidance requires at least two weekday evening surveys and it is considered that in this instance, further surveys should be carried out during the operational hours of the RPS as well as surveys carried out to specifically pick up school drop-off and collection times. The Council’s guidance clearly states regarding surveys that:

- i. Parking availability on roads within 150 metres walking distance of the site
- ii. Snapshot survey Monday – Thursday 2200 – 0000
- iii. Morning and early evening surveys may also be required due to conflict with commuter / commercial use parking. In these cases, surveys between the hours of 0730-0900 and 1730-1900 may be required, noting the amount of parking on a 15-minute basis over this time
- iv. For a site near to an existing regular specific evening / weekend use which may impact on parking in the area, such as places of worship, evening leisure uses: additional surveys should be undertaken when these uses are in operation.

32. Also, whilst the Transport Assessment includes for two surveys, they do not mirror each other and are therefore unrepresentative for the analysis required.

33. It is understood that presently, with permission from BZG, students are dropped off and collected from the north car park, which is owned by the Downs Trust and used by BZG. Following the closure of the zoo, the loss of on street parking on Northcote Road will further compound issues in relation to school/drop off arrangements.

34. The information presented cannot be considered a robust record of current on street car parking activity or relied upon. Therefore, more surveys are required in line with the Council’s methodology to ensure a robust analysis and assessment of parking pressure has been carried out.

#### Accident Record Review

35. Whilst the Transport Assessment claims that there is no issue with the accident records, it has not been sensitive to the evidence that there is a history of accidents involving vulnerable road users. We

note that three uncontrolled pedestrian crossing points are proposed (kerb building outs with tactile paving and dropped kerbs on Northcote Road only), but query that this is substantial mitigation particularly as no account has been taken of the desire lines associated with the students at Clifton College.

#### Summary

36. In summary, it is clear that Clifton College has not been sufficiently acknowledged as part of the BZG application and given the close proximity of the school along the entirety of two of the BZG boundaries, this is a concerning admission.

37. The transport assessment work in support of the BZG application must demonstrate that the Clifton College desire lines have been taken into account and mitigated the effect of the development on highway safety, particularly that of child pedestrians and cyclists.

38. Furthermore, the Full planning application requires a Road Safety Audit Stage 1 to be carried out to review all accesses and associated works on the public highway to give the Council confidence that the provision of the access arrangements can be relied on.

Page 6 of 6

39. Additionally, the Transport Assessment's parking surveys are not in accordance with BCC methodology and therefore are not sufficient or robust. The parking surveys should be carried out again to provide further information that specifically picks up school drop off and pick up, as well as during the operational hours of the RPS, so that a robust assessment of the existing parking provision can be demonstrated.

40. Finally, formalisation of the existing coach drop off and pick up provision for Clifton College on Guthrie Road should be safeguarded and secured by relevant Traffic Regulation Order to ensure no impact following the closure of BZG and subsequent impact on on-street parking.

41. The Clifton College Coach drop off and collection arrangements pre-date the current RPS, yet have still to be taken into account.

#### Clifton College 2 of 4

Date: 28<sup>th</sup> November 2022

Clifton College's response to Revised Plans and Document relating to Planning Application

Reference 22/02737/F at Bristol Zoo Gardens, Bristol, BS8 3HA

Redevelopment of site to include 196 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings.

#### Introduction

This letter provides a response in relation to the revised proposals to the above planning application submitted on the 27<sup>th</sup> October 2022 by Bristol Zoological Society ('BZS'). Previous objections were provided by Clifton College to the planning application as submitted within a letter dated 20<sup>th</sup> July 2022. This included a Highway Technical Note relating to the highway impact of the proposals provided by Highgate Transportation. This previous letter remains relevant and we request that this continues to be taken into account alongside this letter in Officers consideration of the planning application.

As long-standing members and neighbours of BZG, Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however as an operational school with overall responsibility for the safeguarding of its pupils, the revised proposals continue to raise a number of significant concerns for Clifton College, which this letter addresses.

Engagement with BZS Since Application Submission to Date

Page | 48

Clifton College met with the BZS team on the 9<sup>th</sup> June 2022 to discuss a number of concerns that remained unresolved within the submitted planning application. These concerns related to safeguarding and overlooking into sensitive school buildings and grounds, highways safety, daylight/sunlight and heritage impacts.

A meeting was held with the BZS team on the 21<sup>st</sup> November and although changes to the plans have been made, it remains the case that the proposals fail to deal with the detailed objections submitted by Clifton College. These concerns remain within the revised submitted planning application and are set out below.

#### Key Concerns

##### Highways Safety

Clifton College has an overall responsibility for the safeguarding and safety of its pupils and has a particular concern in relation to highways safety. Clifton College instructed Highgate Transportation consultants to review the planning application from a highways perspective. A technical note (the Highway Technical Note) summarizing highway concerns relating to the proposed development was appended to the first letter of objection dated 20<sup>th</sup> July 2022 which is enclosed with this letter for completeness.

An overriding concern is that the presence of a large operational school with 1300 children ranging from nursery age through to sixth form pupils on the boundaries of the BZG appears to have been given limited attention within the submitted Transport Assessment.

The school buildings are spread across an area that is intersected by six different roads. The operating functions of the school require significant movement of children of all ages, but predominantly those aged 11-18, without direct adult supervision, along and across College Road, Guthrie Road, Northcote Road and The Avenue, throughout the day and into the early evening, as they move between lessons and activities. As the College provides accommodation for around 350 boarding pupils, these movements extend to 9pm as pupils visit the sports centre, library and dining halls.

##### Traffic Generation

In relation to traffic generation, the submitted Transport Assessment (dated July 2022) sets out that the forecast traffic generation from the proposed development will be less than that of use of the site as a Zoo. The Highway Technical Note however considers that this fails to have regard to the difference in vehicle movements resulting from the redevelopment of the site which would see an increase in traffic in Guthrie Road and Northcote Road which would lead to an increased conflict between vehicle and pedestrian movements to the detriment of highway safety.

##### Proposed New Accesses

There are significant concerns in relation to the proposed access and circulation patterns associated with the masterplan. It is noted that the proposed vehicular access point on Guthrie Road is a one way entrance only for vehicles with vehicles exiting onto College Road during the morning peak. The Highway Technical Note provided by Highgate Transportation raised concerns that this is currently a gated access and is narrow and not wide enough for vehicles, pedestrians and cycles to access and use alongside each other. As has been set out, this could cause a highway safety issue for pedestrians, including school children as a car would have to wait over the footway if a cycle was exiting the site. This conflict remains and is likely to be made worse by the request in the revised proposals for increased opening hours from 8am which would introduce more vehicular activity along Guthrie Road at morning peak hours.

The Highway Technical Note previously stated that the proposed vehicular access point at the top of Northcote Road directly conflicts with the access points for the school and the movement patterns of children. The response to this from Savills dated 11<sup>th</sup> November 2022 sets out that this access will only serve the proposed northern block which has 21 residents parking spaces and that traffic movements would be limited. This does not overcome the comments raised to date that Northcote Road is mainly

used by Clifton College staff, pupils, and parents rather than for general traffic movements. As noted in the Highways Technical Note throughout the school day there are regular pedestrian movements of children as they move between lessons and between sites. There are concerns around conflicts at drop off and pick up times which will be more noticeable if the gates are allowed to open at 8am as is proposed. The potential conflicts with the new access points are a significant safety concern particularly for some of the school's youngest pupils who are currently dropped off along Northcote Road. The concerns expressed previously have not been overcome and furthermore a Road Safety Audit has not been undertaken of the proposed access.

The revised proposals introduce a new pedestrian access onto College Road, to the northern side of the proposed vehicular and pedestrian entrance. The Highway Technical Note previously identified the need for a road safety audit to be undertaken of the proposed access to establish that appropriate visibility splays can be provided. This work is still outstanding accordingly there is no technical evidence that the proposed access will be acceptable from a highway safety perspective when taking into account the various road users and in particular the more vulnerable users, namely pedestrian / school children.

Concerns are raised within the Highways Technical Note in relation to the lack of road safety audits for all the proposed accesses. It is requested that this matter is specifically dealt with, within this application submission.

We also ask you to revert to the previously submitted Highway Technical Note which also raises concerns relating to the proposed parking surveys that have been undertaken as well as concerns which persist about the impact on the existing coach parking and schools drop off and pick up points.

#### Safeguarding, Privacy and Overlooking

Previous safeguarding concerns were raised within our letter dated 20 July 2022. The response has been provided by Savills on behalf of BZG sets out that a minimum of 21m is achieved between habitable rooms and that cross sections will be produced to demonstrate the relationship between the proposed new buildings and existing Clifton College buildings. These cross sections have not been provided and we reserve our right to make further comments on safeguarding and privacy concerns, before the committee decision date until these have been made available.

In addition, there are legitimate concerns held by Clifton College relating to the increased permeability of the site. These have been raised previously in particular with the introduction of the new pedestrian route adjacent to the Joseph Cooper Music school which has not been addressed within the response provided by BZS, hence we refer to the original submissions in this regard.

The revised submission does not address the concerns raised in our previous correspondence and accordingly we would ask that these concerns are considered by Officers in the determination of the revised submission.

#### Daylight / Sunlight

It is noted that an updated overshadowing information has been provided within a letter from Delva Patman Redler (saved on the planning portal as Daylight and Sunlight Overshadowing Report Addendum). The response provided to Clifton College by Savills (11 November 2022) indicates that acceptable levels of daylight will be achieved at Pooles House and South Town. It is not clear however from the information provided within the Addendum, which provides no commentary on either of these buildings, how it has been judged that the two buildings which are both used as boarding accommodation would receive an acceptable level of daylight with development taking place.

In relation to Poole's House on Northcote Road, the Daylight and Sunlight Report (April 2022) states

that 4 rooms located at lower ground level have the potential to receive a medium to high reduction in daylight levels (under the NSI measurement). The report notes that these are not believed to serve habitable rooms. It was confirmed within Clifton College's previous submissions states that these rooms are habitable rooms used as dining, social and study spaces. These are all used throughout the day and evening and therefore impacts on their daylight/sunlight is a material consideration which needs to be addressed. It is not clear how this has been addressed within the revised submission and Daylight and Sunlight Addendum, accordingly the objections raised are retained.

In relation to Watson's House it is not clear if further information has been provided to the Council, but to confirm this is boarding accommodation and it is felt will be detrimentally affected by the proposal. It is also notable that for the South Town building (a house on Guthrie Road) the Daylight and Sunlight Report (April 2022) states that "this building will have the highest amount of windows that will fall below the BRE recommendations". The report notes that this building is used as an events space, with 30 windows facing the proposals. As has been set out in Clifton College previous submissions, this is a pastoral day house and therefore it is sensitive to the loss of light. The response from Savills (11 November 2022) states that South Town house will retain levels of daylights that are acceptable based on the use of the building, however no evidence has been provided to date to demonstrate that this is the case and accordingly the previous objections raised are pertained.

Clifton College remain concerned that there will be a reduction of the daylight/sunlight within a significant number of its buildings. In this regard there is no reference to potential design mitigations within the submitted report to address these impacts. Finally, the Daylight and Sunlight Report does not assess the impact of the proposals on the existing play areas and amenity spaces that surround the site. The impact on these should also be assessed.

Given the complexity of the report and issues raised, Clifton College reserves the right to comment further on the daylight/sunlight position at later point during the determination of the planning application. No later than an addendum objection statement submitted prior to the determination of the application at the planning committee.

#### Heritage

Clifton College are the guardians of a significant number of heritage assets which includes locally listed and listed buildings, important open spaces, as well the Clifton College Local Historic Park and Garden which also has a protected view crossing over it (View LC24 as identified within the Conservation Area Appraisal). The Conservation Area Appraisal also notes that Clifton College is a crucial landmark nationally and within Bristol. Clifton College is concerned that this sensitive heritage context has not been fully considered and appreciated within the planning application and within the submitted Townscape and Heritage Statements.

Christopher Balme Conservation has been instructed to review the planning application on behalf of Clifton College. The submitted Heritage Statement considers that the 'the introduction of bespoke, bold architecture into this historically separate and different site will have negligible impact to the setting of the listed buildings of Clifton College, nor to its locally-listed buildings along Guthrie, College and Northcote Roads.'

It is our considered view that this is not correct. The scheme will have a significant impact on the setting of Heritage Assets. The proposed five storey, flat roofed, perimeter blocks would be a stark juxtaposition against the variety of Clifton College buildings and residential buildings that surround the site. The predominance of 'bold architecture' that does not respond to the context cannot be considered neutral.

Furthermore, the submitted Townscape Appraisal does not provide a clear overview of the views within the area as a comparison against the existing situation and therefore it is difficult to fully appreciate the impact the proposals will have on the character and appearance of the Conservation Area. To fully

appreciate the impact on the setting of the Clifton College Listed and Locally Listed buildings it is important that the impact of the proposals within the setting of these buildings is fully considered. In this regard the local protected view across the Close Playing Fields towards the Clifton College buildings was requested within Clifton College's previous submissions in order to confirm whether the BZG proposals are visible within the setting and backdrop of these important buildings.

A Visually Verified Montage (VVM) (October 2022) view has been provided from across the playing fields however this only demonstrates the outline of the proposed South Buildings along Guthrie Road with a height of 3 to 4 storeys. Importantly, the VVM has been taken from the wrong location and therefore fails to provide a view and analysis from the corner of Pavillion Lane and College Road. It does not take into account the larger scale development that sits at a higher level, namely the proposed perimeter apartments that make up the North Buildings with a maximum height of 6 storeys or the East Buildings which range in height from 3 to 5 storeys. It is considered that the bulk and height of the North Buildings as well as the East Buildings will be visible from views across the playing fields towards Clifton College which will have a harmful impact on the setting of the Listed Buildings and the character and appearance of the Clifton and Hotwells Conservation Area. The VVM is enclosed for completeness.

It is also noted that a series of CGIs are being produced of the scheme as well as cross sections to show the relationship between the College buildings and the proposed development. These have not been provided at this current time.

Clifton College reserve the right to comment further on the above heritage concerns during the determination of the planning application. No later than an addendum objection statement submitted prior to the determination of the application at the planning committee.

#### Design Concerns

The revised proposals have introduced a number of design changes. Notwithstanding this, Clifton College continue to consider that the form and scale of the proposed buildings around the perimeter of the site are not sympathetic to the surrounding historic buildings or the character of the Conservation Area.

The scale and massing of the new buildings is also out of keeping with the surrounding buildings and townscape. In particular the scale of the East Building which rises to 5 storey buildings along Northcote Road is not appropriate in comparison to the more modest scale of the adjacent Clifton College buildings which are generally 2 to 3 storeys in height. The proposals will also introduce a 4 storey Building S1 adjacent to the much lower rise locally listed Joseph Cooper Music School. The design changes that have been introduced to the South Building along Guthrie Road include the introduction of vertical bays and realignment of windows however the scale and massing of the South Building S1 remains bulky, and its monolithic form is at odds to the variety at Clifton College and the character of the Conservation Area.

The design changes made to the proposed Northern perimeter building which include the stepping down of height, introduction of balconies and other design changes as illustrated in the Design and Access Addendum does not alter the scale and overall mass of the buildings. As such, as set out in previous submissions, Clifton College remains concerned that the proposed perimeter buildings fail to conform to Policy DM26: Local Character and Distinctiveness, of the adopted Site Allocations and Development Management Policies Local Plan (2014). In addition the residential elements of the scheme do not align with the principles contained within the Council's adopted Urban Living SPD (November 2018) in particular relating to responding positively to the context. It is considered that the proposals do not respond appropriately to the height, scale, massing, shape, form and proportion of existing buildings, skylines and roofscapes. It is also considered that the proposals fail to reflect locally characteristic architectural styles, rhythms, patterns, features and themes taking account of their scale and proportions.

Demolition of the Conservation Education Centre

Page | 52



This building on Guthrie Road was only recently refurbished and extended. Clifton College questioned the sustainability of demolishing a recently developed building and whether it would be more appropriate to retain this in education use which would require minimal works given the existing use of the building. The response provided by Savills sets out that the building has constraints and limitations that would impact on its ability to be re-used. Whilst this is noted other opportunities for the re-use of the building could have been explored. There is still an opportunity to impose a planning condition which states that the applicant should look into marketing the premises for re-use purposes for a period of 12 months following the potential grant of planning permission.

#### Construction Impact and Conditions

Clifton College have previously raised concerns relating to the construction impacts on its day to day operations as an existing school. In relation to the impacts of construction deliveries there is a highways safety concern as its pupils move between lessons on the surrounding streets. Construction noise is also a particular concern given the need for quiet to teach, conduct music lessons and to conduct examinations.

As set out in previous submissions Clifton College requests that it is consulted on any future Construction Environment Management Plan (CEMP) and Construction Method Statement (CMS) before it is approved by the Council so that its activities can be considered in the development of these documents. The response provided by Savills sets out that Clifton College will have the opportunity to discuss the detail of the CEMP and CMS once a developer is on board. It is not known when a developer will be on board and as such Clifton College reinforce a request to be consulted and that the Council attach appropriate conditions to any likely consent to ensure that such matters are appropriately conditioned.

#### Future Management of the Site

The future management of the site will to a large extent be dependent on the future developer/s which are not currently known. Clifton College wish to see that BZS remain involved in the future management of the site for the long term to ensure that the interests of itself and the wider community continue to be considered.

#### Summary

As long-standing members and neighbours of the BZS, Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however Clifton College still has significant concerns relating to the impact of the proposals as set out in the initial letter dated 21 July 2022 and within this letter which will have a lasting detrimental impact on the school.

We trust these comments will be taken on board by the Council in the determination of this planning application and we welcome a discussion with you in relation to these issues. Clifton College reserve the right to comment further on the planning application, no later than two days before the committee date, during its determination period.

Yours Sincerely

Tim Greene	Nick Tolchard
Head of College	Chair of Council

Clifton College 3 of 4 c/o Highgate Transportation

Date: December 2022

TECHNICAL NOTE

PROJECT: Reps on behalf of Clifton College for Application 22/02737/F

Page | 53

1. This report has been provided by Highgate Transportation (HTp) further to Technical Note 01/A (dated July 2022) that was submitted to Bristol City Council as part of a wider representation on behalf of Clifton College.

2. Technical Note TN/02 will build upon the review in TN/01 and set out pupil movements and school activity to demonstrate the impact on pupil safety arising from the new accesses to the redeveloped Bristol Zoo Gardens (BZG) site on College Road, Northcote Road and Guthrie Road, and the subsequent residential traffic generated.

3. The BZG site is surrounded on at least two sides by Clifton College and the route for new residents and Clifton Village (for example) will increase vehicular movements on College Road and Guthrie Road – see Figure 1.

4. Furthermore, the proposed two-way vehicular access at the northern end of Northcote Road (see BZG masterplan contained in Appendix 1) will funnel new vehicular movements through a busy entrance/exit for around 200 Prep pupils (7-13 year olds); with the residential peak hours coinciding with school drop off in the morning and pick up late afternoon.

5. Clifton College is an Independent Day & Boarding School operating seven days a week 0845 to 1800 hours during term time for lessons (Monday through Saturday inclusive) with around 375 Boarders throughout the week (36 weeks of the year, with pupil movements across the local area between 0730 and 2200 hours seven days a week). See Appendix 2 summary of pupil movements, quantum, frequency and associated information. In addition, there is a Holiday Club (all holiday periods throughout the year, aside from the Christmas break) and other community activity.

HTp/2250/TN/02 Page 2 of 6

Figure 1 – Site context

6. Clifton College also holds charity and community events weekly, such as the Rotary Club concert, Independent Schools rugby tournament (500 people), Schools Triathlon (2,000 people), as well as have Residential lettings for local and International schools and community groups throughout the Easter and Summer holidays.

7. Given the above, it is clear that Clifton College is extremely busy, operating 52 weeks of the year, with thousands of pedestrian movements daily concentrated in and between Guthrie Road, College Road and Northcote Road in particular.

8. The main issue with the BZG application, as set out in Technical Note 01/A, is the omission that Clifton College has thousands of pupil movements (from the age of 4 years old) throughout the day, six days a week, walking to and from the various buildings on Northcote Road, Guthrie Road, The Avenue and College Road, as well as to New Field to the west, off Cecil Road and Percival Road. These well-used desire lines associated with pupil movements have been repeatedly ignored within the assessment work. See Appendix 3 for a visual representation of pupil movements.

HTp/2250/TN/02 Page 3 of 6

9. The transport work has failed to consider the impact of the vehicular trips generated by the redevelopment, with its new access points, on the pupils of Clifton College. Not only were the majority of vehicle movements associated with BZG confined to the northern side of the site (the A4176) i.e. away from Clifton College pedestrian movements, but the peak hours and peak season i.e. the busiest times for BZG trip attraction (as used for the baseline assessment in the transport work) do not coincide with the daily movement of pupils as would the proposed residential scheme.

10. Given this, the net traffic impact benefit cited in the application is of no significance when

considering the increase in vehicular traffic forecast on Northcote Road, Guthrie Road and College Road as a direct result of the redevelopment. This is to the detriment of highway safety of vulnerable road users.

11. The recent reduction from 201 to 196 residential units on the BZG site does not materially lessen the impact.

#### Local Highway Layout & Pupil Movements

##### Northcote Road

12. Northcote Road operates one-way (northbound only) with one footway around 1.8 metres wide on the eastern side and no footway on the western side. On-street parking, marked by dashed white lines, occupies much of both sides of the carriageway, with gaps for some property accesses. Northcote Road sees heavy pedestrian traffic throughout the day, particularly south of the entrance to the Prep school, as pupils regularly walk to and from facilities on Guthrie Road.

13. In summary, there are a minimum of around 100 pupil movements along Northcote Road hourly, rising to around 200 during the lunchtime period, up to around 400 pupil movements on Wednesday afternoons, and as many as 500 movements between 0745 and 0815 and also between 1600 and 1800 hours i.e. thousands of vulnerable road user movements per day.

14. Given this level of footfall, it is clear that further pedestrian movements on this single footway will result in either adults or children walking in the carriageway, significantly increasing the risk of a serious or even fatal pedestrian/vehicle collision occurring.

15. The proposed pedestrian crossing build-out from the BGZ site centrally on Northcote Road is clearly of no benefit to Clifton College pupils given there is to be no footway on the western side to cross to i.e. this is only a link to the site. It should be noted here that the transport assessment work failed to acknowledge the vulnerable road user personal injury accidents recorded.

##### Guthrie Road

16. Northcote Road forms a simple priority junction at its south eastern end with Guthrie Road. A raised table and carriageway narrowing provides a crossing over the north eastern arm of the junction, and the north western footway on Guthrie Road is built out to narrow the carriageway on the south western arm.

#### HTp/2250/TN/02 Page 4 of 6

17. In summary, there are a minimum of around 100 pupil movements crossing the carriageway at the junction of Northcote Road and Guthrie Road hourly, the majority of which are unaccompanied (aged 11-13) and accompanied (aged 4-11) pupils travelling between Northcote Road and Guthrie Road (west). This rises to at least 300 pupil movements crossing the carriageway at the junction during the morning and evening peaks. There are further east-west movements of around 100 Upper School pupils at the junction each hour.

18. It is clear that an increase in pedestrian and vehicle traffic across this junction will result in a corresponding increase to risk, particularly to the vulnerable road users - who are the main users of the junction. No improvements to the crossing facilities at this junction are proposed as part of the BZG development.

##### College Road

19. Guthrie Road forms a simple priority junction at its western end with College Road. A raised table covers the area of the junction, which forms an informal shared space between pedestrians and vehicular traffic and provides a calming effect to vehicles traversing the junction. Uncontrolled crossings are also provided on each arm, marked by tactile paving.

20. This junction facilities a high number of pedestrian movements across it – at least 300 hourly throughout the day, with significantly more during the peaks, due in part to the College facilities on both sides of the roads and coach pick-up/drop-off point situated adjacent to the junction. These movements are made over all arms of the junction, and also diagonally across the carriageway.

21. It is understood that this arrangement operates satisfactorily with current levels of traffic. However, an increase in traffic during the peak hours and throughout the day (arising from the new access locations around the BZG site on key roads) is likely to result in serious additional risk to the vulnerable road users crossing at this junction.

22. College Road is a single carriageway road, with footways around 1.9 metres wide on both sides of the carriageway. On-street parking, marked with dashed white lines, is present along much of the length of the road on both sides. College Road, at and south of Guthrie Road is an important thoroughfare for pupil movements to, from and around Clifton College, as college facilities and pupil accommodation buildings are located on this road. Pupils accessing the College from accommodation on the western side of College Road cross the carriageway, and vice-versa. A zebra crossing facilitates some of these movements, however, it is located off the main desire lines. Informal crossing movements are common throughout the day, at around 200 pupil movements per hour.

#### Access to New Field

23. New Field lies to the west of the main Clifton College buildings and facilitates rugby and cricket activities. It is also occasionally used for large-scale parking for events held by Clifton College.

#### HTp/2250/TN/02 Page 5 of 6

24. These pedestrian movements are made via Percival Road or Cecil Road, with up to around 150 pupil movements in an hour cross this junction during the day when accessing New Field, with significant increases on event days, which may see many hundreds of pedestrian movements in a short space of time. See Appendix 2.

#### Deliveries

25. Throughout the day, deliveries to the college are made at Porter's Lodge, situated on Guthrie Road approximately opposite the junction with Northcote Road. A loading bay is marked on the carriageway with dashed white lines, with space for two vans or LGVs.

26. Catering deliveries are made to the college to a loading area on the south side of Guthrie Road. A dropped kerb forms a vehicle crossover of the footway, allowing LGVs and HGVs to reverse into the loading area. It is noted that the loading area is not large enough to accommodate a large HGV, which blocks the footway and protrudes into the carriageway during unloading.

#### Coach & Mini-Bus Travel

27. Coaches and minibuses are regularly used to transport pupils attending Clifton College to the Sports Ground in Leigh Woods or to other schools for fixtures. There is a coach pickup/drop-off point on the north side of Guthrie Road, close to the junction with College Road. Coaches pick up and drop off pupils here multiple times Monday to Saturday to transfer pupils between sites. Coach movements during term time are listed in Table 1.

Table 1 – Coach movements on Guthrie Road

**Table 1 – Coach movements on Guthrie Road**

Day	Time	Pick-up/drop-off	Number of Pupils	Pupil age group
Monday	1400	Pick-up	100	Upper
	1430	Pick-up	200	Prep
	1600	Drop-off	100	Upper
	1700	Drop-off	200	Prep
Tuesday	1330	Pick-up	655	Upper
	1730	Drop-off	655	Upper
Wednesday	1330	Pick-up	400	Prep
	1600-1700	Drop-off	400	Prep
Thursday	1330	Pick-up	655	Upper
	1730	Drop-off	655	Upper
Friday	1430	Pick-up	200	Prep
	1700	Drop-off	200	Prep
Saturday	0930	Pick-up	200	Prep
	1100	Pick-up	200	Prep
	1100	Drop-off	200	Prep
	1100	Pick-up	655	Upper
	1230	Drop-off	200	Prep
	1900	Drop-off	655	Upper

28. Minibuses operate daily, transporting pupils to various locations. These minibuses operate to and from a parking area accessed via a crossover on the south side of Guthrie Road.

**BGZ Traffic Generation**

29. The submitted transport assessment work has again been reviewed and in the context of the expected rise in vehicle/pedestrian conflict on College Road, Guthrie Road and Northcote Road, can be summarised as:

- i. 752vpd forecast from the development (using very low trip rates) – 635vpd of these are residential trips
- ii. 53vph in the AM peak hour of 0800-0900 i.e. one vehicle per minute
- iii. 48vph in the PM peak hour of 1700-1800 i.e. one vehicle per minute

30. It should be noted that Clifton College is not in agreement with the trip rates and distribution from the submitted transport assessment work. The work does also not take Saturdays into account, where high volumes of development trips to/from Clifton Village will use these three important road links, in direct conflict with vulnerable road users.

**Summary**

31. In summary, it is clear that Clifton College has not been sufficiently acknowledged as part of the BZG application and given the close proximity of the school along the entirety of two of the BZG boundaries, this is a concerning admission.

32. No account of desire lines associated with the pupils at Clifton College has been taken into account, or of the significant volume of pedestrian movements in this location that occur hourly throughout the day.

33. It is also clear that the BZG proposals do not mitigate the impact the redevelopment will have on Clifton College pupils and the road safety dangers arising.

Clifton College 4 of 4

Date: 31<sup>st</sup> January 2023

Dear Case Officer,

Response to revised plans and additional supporting documents relating to planning application reference 22/02737/F at Bristol Zoo Gardens (BZG), Bristol, BS8 3HA

#### Description of Development:

Redevelopment of site to include 196 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings.

#### Introduction

This letter provides a response in relation to the revised proposals to the above planning application submitted on the 12th and 13th January 2023 by Bristol Zoological Society ('BZS'), with a particular emphasis on those areas of change included within the proposal including: safeguarding, privacy and overlooking, daylight/sunlight, highways and Verified Visual Montage, Areas of Comparison and Heritage. As long-standing members and neighbours of BZS, Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however, as an operational school with overall responsibility for the safeguarding of its pupils, the revised proposals continue to raise a number of significant concerns for Clifton College, which this letter addresses.

#### Engagement with BZS Since Application Submission to Date

Clifton College met with the BZS team on the 9th June 2022 to discuss a number of concerns that remained unresolved within the submitted planning application. These concerns related to safeguarding and overlooking into sensitive school buildings and grounds, highways safety, daylight/sunlight and heritage impacts.

More recently Clifton College have been contacted by the BZS team to discuss the revised submission and a formal response to the objections raised by CC to the planning application was provided on the 11th November 2022. This response was received following the submission of the revised proposals to the Council which took place on the 26th October 2022.

A meeting was held with the BZS team on the 21st November 2022 and it remains the case that the proposals fail to deal with the detailed objections submitted by Clifton College. These concerns remained within the initially revised submitted planning application and concerns were again set out in a letter submitted to yourself on the 28th November 2022 (collated version 21st December 2022). The letter addressed the College's concerns around highways safety, safeguarding privacy and overlooking, daylight/sunlight, heritage, design, demolition of conservation education centre, construction impact and future management of the site.

An additional Technical Note on Pupil Movements, prepared by Highgate Transportation was submitted for consideration by Bristol City Council on 6th January 2023.

#### Safeguarding, Privacy and Overlooking

Previous safeguarding concerns were raised within our letters dated 20th July and 28th November 2022. Previously, a response had been provided by Savills on behalf of BZG setting out that a minimum of 21m is achieved between habitable rooms and that cross sections will be produced to demonstrate the relationship between the proposed new buildings and existing Clifton College buildings. Four updated plans and section drawings have been submitted namely; BUILDING\_DISTANCES\_-\_E1\_SECTION\_\_\_PLAN-3378460, BUILDING\_DISTANCES\_-\_E2\_PLANS\_\_\_SECTIONS-3378461, BUILDING\_DISTANCES\_ -

\_S1\_SECTION-3378453 and BUILDING\_DISTANCES\_-\_E3\_SECTION\_\_PLAN-3378455. However, none of these sections demonstrate a significant increase in building distances with a number of distances either remaining the same or increasing only by nominal amounts e.g. 20cm. In the context of the overall proposals, these increases in distance are considered minimal and it is the view of the College that the proposed changes do not go far enough to reduce the risk of overlooking.

The College observe that a number of minor changes have been made to the proposed southern and eastern elevations of Block E1 (shown in plan BLOCK\_E1\_-\_PROPOSED\_ELEVATIONS\_-\_SOUTH\_\_EAST-3378662) and the proposed north and east elevations of Block E2 (shown in plan BLOCK\_E2\_-\_PROPOSED\_ELEVATIONS\_NORTH\_\_EAST-3378667). The 'Response to the Case Officer's document submitted as part of the revised proposals outlines that Block E1 has been amended as follows (extract from Response to Officer document in bold):

- Incorporation of eight angled bay windows with translucent glazing (to 1.7m) on eastern elevation to overcome potential overlooking concerns. This is shown on the updated elevations and floor plans.

And that:

Block E2 has been amended as follows, to better configure its relationship to the Hornby Arts Centre:

- Level 1 - revised design of layout on level 1 with reconfigured 2bed apartment
- Level 1 & 2 – 3 bed apartment - reconfiguration of bedroom and hall to increase distance between windows of neighbouring building

In response to the proposed elevation changes to Block E1 the College note that the differences in proposals are marginal. With 16no. 'windows with recessed brickwork' changed to 'Angled bay window with translucent glazing (to 1.7m above FFL) facing east to Northcote Road. Clear opening side light facing south.'

The introduction of the new window proposals do not completely alleviate the College's overlooking concerns. There are still 28no. bedroom windows visible on the proposed eastern elevation. Block E1 is located to the north east of the BZG site fronting Northcote Road, immediately opposite the College's Preparatory School Main Building (Building 4)<sup>1</sup> and Mansfield's House (Building 3).

As such if the proposals were to wholly alleviate the College's safeguarding concerns around overlooking and to provide a truly acceptable level of privacy for neighbouring uses and future residents of the new development the College request that the window alterations be made to all windows on that elevation, particularly those which face into/out of a bedroom.

Block E2 is located to the east of the BZG site fronting Northcote Road, immediately opposite the College's assets at 7- 8 Northcote Road (Building 7) which includes the Director of Safeguarding's office, Prep School Counsellor, Chaplaincy and multi faith room, Prep EAL and learning support department, the Hornby Arts Centre (Building 9) and Bretten Memorial Hall (Building 8).

The proposed changes to the layout of apartments is marginal and does not result in a notable increase in distances between the proposed building and the College's assets, as such the College consider their concerns around safeguarding and overlooking to still apply in this instance.

In addition, there are legitimate concerns held by Clifton College relating to the increased permeability of the site. These have been raised previously in particular with the introduction of the new pedestrian route adjacent to the Joseph Cooper Music school which has not been addressed within the response provided by BZS, hence we refer to the original submissions in this regard. The updated plans do not address these concerns.

The revised submission does not address the concerns raised in our previous correspondence and accordingly we would ask that these ongoing concerns are considered by Officers in the determination of the revised submission.

#### Highways

An internal distribution plan demonstrating the proposed internal movements of pedestrians, cars and other vehicle movements has been provided as part of the updates. However, the plan does not outline Building Numbering as Shown on Clifton College Main Campus Map. Accessible Here: [Clifton-College-Main-Site-SEP-2020\\_PRINT-scaled.jpg \(2560x1812\) \(cliftoncollege.com\)](#)

the breakdown of transport movements into and out of the site. For completeness, the College request the plan be updated to include this.

A Site Access Strategy plan has been provided which identifies all of the site entrances and whether that entrance is accessible for pedestrians, cyclists, resident's car access or service vehicles/delivery vehicles. However, this plan does not demonstrate the volume of movement into and out of the site and the College request that the plan is updated to reflect this.

In the absence of any further updates to details around transportation and highways at the site, the College consider that their concerns around increased vehicle movements and potential risk to the College's pupils have not been addressed. As such the College would ask that their concerns highlighted in previous correspondence are still duly considered by Officers in advance of the application going to Committee in March 2023.

#### Verified Visual Montage, Areas of Comparison and Heritage

A Visually Verified Montage (VVM) view has been provided from across the College playing fields (The Close), from the base of the Cricket Pavilion. However, this only demonstrates the outline of the proposed South Buildings along Guthrie Road with a height of 3 to 4 storeys and not the larger scale development that sits at a higher level, namely the proposed perimeter apartments that make up the North Buildings with a maximum height of 6 storeys or the East Buildings which range in height from 3 to 5 storeys. Additionally, the proposed view included within the VVM is neither taken from the protected Local View (LC24) which runs from the south-west corner of the College's Grounds or the identified Long View (L25) as identified in the Clifton and Hotwells Conservation Area Character Appraisal (CACA) Important views and Landmark Buildings Map. Long views are long distance views across the City to key features or landmark buildings. In this instance Long View L25 stretches from the grounds of Clifton College northwards across the College and BZG site, both of which are identified within the CACA as Landmarks of City-wide importance. As a consequence of this the College consider the VVM does not accurately reflect those protected views, as identified in the CACA, and request an updated VVM which accurately reflects the impact of the proposals at the BZG site on Local View LC24 and Long View L25.

It is also noted that a series of CGIs of the scheme have been produced (dated 5th December 2022). However, the additional views of Northcote Road, as outlined in the 'Response to the Case Officer' document have not been formally submitted as part of the application as they are not 'settled CGIs' and as such cannot be considered in the overall determination of the proposals. The College request that these additional CGIs be updated and formally submitted for due consideration, as an important part of the overall application.

A detailed areas of comparison document (ref: AREAS\_OF\_COMPARISON-3378471) has also been provided. These plans are useful in demonstrating areas of comparison between existing and proposed areas across the site including play, lake/wetland, buildings and hardstanding and public/private areas.



Clifton and Hotwells Conservation Area Character Appraisal Important views and Landmark Buildings Map. Accessible Here: <https://www.bristol.gov.uk/files/documents/2928-cliftonfinaljulyjustmaps/file>

However, these are only in 2D and show only land take, with no consideration for heights, daylight/sunlight, and the orientation and layout of the development. As such the College requests that consideration be given to the wider documentation available to ensure that all elements of the proposal are duly considered.

#### Daylight/Sunlight

Further to our letter dated 28th November 2022, no additional detail concerning Daylight/Sunlight has been provided, with only a Tree Shade Analysis provided in the updated documentation (ref: SHADE\_ANALYSIS\_-\_APPENDIX\_9-3378482), as such the College's concerns around material impacts on boarding houses and daylight/sunlight have not been addressed and the College request these outstanding queries be addressed ahead of a decision being made on the application.

#### Summary

Clifton College acknowledges that the BZG site will need to be developed however the College has significant concerns relating to the impact of the proposals as set out in previous correspondence and within this letter which will have a lasting detrimental impact on the College and its pupils. We trust these comments will be taken on board by the Council in the determination of this planning application and we would welcome a discussion with you in relation to these issues. Clifton College reserve the right to provide further comment, as required, during this determination period on the planning application, no later than two days before the committee date (March 2023).

Yours Sincerely

Dr Tim Greene

Head of College

#### Conservation Advisory Panel 1 of 2

Date: 5<sup>th</sup> July 2022

Commenter Type: Conservation Advisory Panel

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: It is acknowledged that the re-use and re-development of a facility that was originally developed and evolved over many years for a specific use is challenging. However, that does not mean that the scheme as proposed is acceptable. There is significant concern with the proposed quantum and scale of development, the poor quality of the architecture, the site layout and the adverse harm that would be caused to the character and appearance of this part of the Clifton and Hotwells Conservation Area and the setting of the listed buildings.

This is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over intensive with a consequential poor relationship with the adjacent School and its listed buildings. The north building at 6 storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular, the Bear Pit would be overly dominated by new development.

There are concerns with the impact on retained green infrastructure. Particularly with regard to the

Page | 61

buildability of the quantum of development whilst retaining the specified trees. There are significant questions over the long term maintenance of the proposed public space. The gardens are a locally listed heritage asset. The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site. Consequently, it is considered that the proposal would neither sustain nor enhance the significance of relevant heritage assets including the Conservation Area and listed buildings within and without the site. It would provide insufficient substantial public benefit to outweigh the substantial harm caused by the impact of such a poor scheme on the relevant heritage assets. It is not considered that this scale of development can be justified in a heritage context. Moreover, it accords with neither the relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported.

## Conservation Advisory Panel 2 of 2

Date: 22<sup>nd</sup> November 2022

### Overall Comment

It is acknowledged that the re-use and re-development of a facility, which was originally developed for a specific use and evolved over many years, is challenging. However, that does not mean that the scheme as proposed is acceptable. There is significant concern with the proposed quantum and scale of development, the poor quality of the architecture, the site layout and the substantial harm that would be caused to the character and appearance of this part of the Clifton and Hotwells Conservation Area and the setting of the listed buildings. Not to mention the effective loss of an established, nationally recognised zoological facility and gardens.

### Harm to overall historic interest and significance of site

The May 2022 Heritage Statement acknowledged the harm that is caused to the site and Conservation Area through the departure of the Zoo from its historic home, a point echoed by Historic England. The CAP disagrees that this harm is justified by the current proposal, and there is no evidence presented by the applicant that they have looked at alternative uses for the site, neither have BCC nor HE so far examined the business case that concludes that closure of the Zoo site and the change of use is necessary or inevitable. The significance and irreplaceability of the site as a whole is fundamental to this application. Bristol Zoo Gardens is the oldest one in the UK and the fifth oldest in the world. It has been open for 150 years. NPPF 189 states: 'These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'.

### Loss of Communal Value

Defined as 'Value deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.' in English Heritage, Conservation Principles, 2008. At the public level, hundreds of thousands of people have visited the Zoo as children, as adults and with their own children for more than 150 years and the loss of this experience is not to be taken lightly. Additionally, the ashes of many people have been scattered within the herbaceous borders - to be lost under a roadway - while others have held weddings and celebrations in the Pavilion, which will be lost to flats. These memories and experiences - communal value - are

engraved in the psyche of thousands and will be lost or unavailable under this scheme. The communal value of this site cannot be underestimated and once lost will be gone forever.

#### Harm to listed buildings

The original and particular use of many of the buildings is integral to their historic significance and is cited as a key reason in the listing designations of the four animal houses on the site, justifying their listing at Grade II and their national importance. Harm to an asset of this significance should clearly be only as a last resort. The D&A statement refers to 'Historically significant buildings retained and sensitively converted to unique, environmentally sustainable homes'. But the CAP finds that such conversion would completely change the presentation and significance of these buildings, meaning the loss of: the Clifton Pavilion, Great Aviary/Parrot House, Giraffe House and the Museum/Activity Centre, all to apartments. It is not considered that the applicant has made the case for the level of harm proposed to the listed buildings within the site.

#### Justification of harm

It is recognised by the NPPF that new uses are sometimes needed for heritage assets to generate income for their long-term future. In order to do this, it may be necessary to cause some harm, but it is clear that in identifying the 'optimum viable use' for a heritage asset, the optimum viable use is one that causes the least harm to significance. The CAP argues that the proposed scheme would cause significant and irreversible harm and is not justified.

#### Alternatives

Other proposals for the site have been put forward either in broad outline or in detail and this suggests that other schemes are possible. Covid has provided a distraction so that disposal of the site is presented as a finished decision. But this is a nationally important site and time could usefully be taken to allow further time for ideas or to run a competition to determine its future.

While the governance of the Zoo is that of a limited company, it is also a charity with long-standing public responsibility. While it is acknowledged that the Trustees have fiduciary duty, the Objects of the Charity itself are to promote the public understanding and the conservation of wildlife and the natural environment and the scientific study of plants and animals. This housing estate proposal does not deliver either of these, while an alternative, perhaps in association with a body such as the Eden Project or the RHS, would do so.

#### Public amenity

#### Page 3 of 4

The proposed public access and maintenance of the gardens is to be funded by a levy on the residents. But there is insufficient evidence that this right will be granted in perpetuity as this access is permissive and could be modified or withdrawn. It is the prediction of many objectors to his scheme that the diverse, spontaneous visitors imagined in the D&A statement will not materialise; residents will object to funding a public amenity and in time it will become a private space. As presented, while pedestrian access is marginally improved, it is still tightly controlled and timed. The general perception and experience of the site will be as a gated community, not welcoming and few will cross town to go there.

#### Design

Even if there were no alternative to building densely on the site, the proposal is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over-intensive with a consequential poor relationship with the adjacent school and its listed buildings. The north building at six storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular the Bear Pit would be overly dominated by new development.

#### Landscape

Bristol Zoo Gardens are a locally listed heritage asset designated as a Local Historic Park/Garden and an Important Open Space. The Avon Gardens Trust has voiced concerns around the loss of trees, the viability of translocating other trees and hedges and the general impact on green infrastructure from ground and environmental disturbance during the long phases of works and the eventual overshadowing from tall buildings.

#### Cars and Parking

The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought not least as it creates another visual and psychological barrier for free pedestrian access to the green spaces within the site. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site.

#### Conclusion

##### Page 4 of 4

As set out within Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council has a legal duty to have special regard to the desirability of protecting listed buildings and their settings, and also to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. This means that decision makers must give 'considerable importance and weight' to heritage issues when assessing an application. This has not been done in this instance.

The NPPF requires great weight to be given to the conservation of heritage assets. If there is substantial harm to or total loss of significance of a designated heritage asset, then permission should be refused unless the public benefits outweigh this level of harm, or the applicant can demonstrate that there are no other viable uses.

It is considered that the proposal would neither sustain nor enhance the significance of relevant heritage assets including the Conservation Area and listed buildings within and without the site. It would provide insufficient substantial public benefit to outweigh the substantial harm caused by the impact of such a poor scheme on the relevant heritage assets. It is not considered that this scale of development can be justified in a heritage context and the loss of the site as a public amenity is unacceptable. Furthermore, the applicant has not demonstrated that there are no other viable uses for the site. Consequently, the application does not accord with the applicable legislation, relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported.

### Crime Reduction Unit

I am a Crime Prevention Design Advisor (CPDA) with a responsibility for Crime Prevention Through Environmental Design (CPTED) projects within the Bristol area. As a Constabulary we offer advice and guidance on how the built environment can influence crime and disorder. Paragraphs 92, 97 and 130 of the National Planning Policy Framework (adopted July 2021) require crime and disorder and fear of crime to be considered in the design stage of a development. Other paragraphs such as 8, 97, 106, 108, 110, 112 and 119 (also require the creation of safe environments within the context of the appropriate section. The Bristol Development Framework Core Strategy (adopted June 2011) states that one of the overarching issue for ensuring a sustainable future is reducing the opportunity for crime. Bristol Local Plan Site Allocations and Development Management Policies (Adopted July 2014) section DM28: Public Realm states that Development should create or contribute to a safe, attractive, high quality, inclusive and legible public realm that contributes positively to local character and identity and encourages appropriate levels of activity and social interaction. Section 4 adds that development will be expected to: Reduce crime and fear of crime by creating a well-surveyed public realm that is well managed and cared for; I have viewed the planning application and have the following comments. I acknowledge the comments regarding security in the Design and Access Statement and show them below. Crime prevention through environmental design (CPTED) and Secured by Design (SbD) principles have been applied to the whole development. This includes layout of roads, footpaths, parking, lighting, communal areas, boundary treatments and layout and orientation of dwellings. Communal areas, playgrounds and seating areas have been designed to allow supervision from nearby dwellings with safe routes for users to come and go. Boundaries between public and private space are clearly defined and open spaces have features which prevent unauthorised vehicular access, such as edge treatments and bollards. Undercroft parking is access controlled and covered parking areas are passively surveyed by neighbouring properties. Rear covered car parking is proposed to the service road between the northern apartment blocks and the boundary wall but is securely gated at each end and is within the guidelines contained in the Bristol City Council SPD, Local Plan and Manual for Streets. Communal cycle parking is secure with access control and CCTV. Communal parking facilities will be lit to the relevant levels as recommended by BS 5489:2020. The proposed S1 apartment building serves over 25 flats (31 no.) sharing a single core. It can be compartmentalised using access control to prevent the free unlawful movement through the structure. I would like to add the following points. There is mention of discreet undercroft parking (landscape statement p.49). Whilst the image shown maybe indicative of the design, this type of arrangement (if open) can make the vehicle and any door set or window within the undercroft vulnerable. External cycle storage for the dwellings should meet LPS 1175. Any communal mailboxes must meet the requirements of TS 009. The management plan should demonstrate how the site will be secured outside of daylight hours. I would also like to add that the affordable housing will have to satisfy the LPAs Affordable Housing Practice Note (April 2018) which needs to meet or exceed the standards specified in the former Housing Corporations Design and Quality Standards (published April 2007). This document states, ensure that the scheme design reflects advice obtained from local police architectural liaison officers/crime prevention design advisors prior to detailed planning stage and obtain Secured by Design certification wherever possible. As such we can provide advice on Secured by Design, from the outset. If there are any questions concerning these comments, then please feel free to contact me.

Peter Wozniak Crime Prevention Design Advisor.

## Design West

Date: 26<sup>th</sup> July 2022

Dear Geraint

DESIGN WEST BRISTOL Design Review

DWB046 Bristol Zoo Gardens 11 July 22

Thank you for returning with the above scheme to Design West for the third time and giving us the opportunity to comment on the proposals now submitted as a full planning application as well as for listed building consent for this extremely attractive and significant site. We would also like to thank the client team, Penoyre & Prasad, LUC, Alan Baxter, Max Fordham and Savills for attending the review and their clear and very comprehensive presentations and detailed information. The panel recognises the quality and extensive work carried out since the last review by the Bristol Zoological Society and the whole design team to provide a residential development on this site of complex location, size and constraints.

This letter summarises the recommendations made by the panel on the day.

Declarations of Interest: None

The Site and Proposals

The proposals are for Bristol Zoological Gardens ('Bristol Zoo'), a 12 acres local historic park and garden located within the Clifton and Hotwells Conservation Area. The site is bound by the A4176 with the Downs behind to the north, College Road to the west, Guthrie Road with Clifton College to the south and Northcote Road to the east. The site is currently surrounded by walls, given its current use as a zoo, some of them listed.

The site itself includes listed and locally listed buildings and is within the setting of a number of listed buildings, the majority of which are part of Clifton College. Following a comprehensive assessment of the site by Historic England in 2021, there are now six Grade II listed buildings/structures on the site: The Monkey Temple, the former Bear Pit (the current Aquarium), the Birds of Prey Aviary, the northern Entrance Lodge building, the former Giraffe House (the current Gorilla House) and the southern entrance gates with their flanking walls. Clifton Pavilion in the western side of the site is locally listed.

The site is also designated Important Open Space with a number of the trees subject to Tree Preservation Order no. 1438. The use as a zoo represents a valued and much-loved community facility, which is acknowledged by its nomination to the Council's Assets of Community Value List.

The proposals are for 201 dwellings (a reduction of 4 dwellings since the last review) with 20% affordable homes, the reuse of the entrance building as Clifton Conservation Hub, reuse of the Terrace Theatre and enclosures as follies in the landscape, 118 parking spaces (a reduction of 5 spaces) and associated landscaping, most of which will be retained from the zoo gardens. The existing lake will be reshaped. Building heights range from 1-storey (mainly existing) to 6-storeys in the Northeast corner.

Main Discussion Points

The principle of the proposals remained but they have been developed further in technical detail since the last review and some amendments have been made.

The panel welcomed the clearer narrative 'Bringing people together' and 'Connect people and wildlife' but felt that the vision and actual design response have not been fully aligned yet. It needs to be absolutely clear how the site is to be managed and controlled and how residents are going to be interacting with visitors to the park. Potential phasing, buildability and provision of sufficient working space should also be considered at this stage.

The following will pick up points as they arose during the review, referring back to the principles and headlines of the WECA Placemaking Charter.

Employer's Requirements: Leaving these decisions to the contractor without setting direction and definitive targets might not get the desired outcome. These should also be supported by detailed

Page | 66

planning drawings and documents. The detail of some of those features also needs to be worked through further such as e.g. cleaning/maintenance of the PVs on the lake houses.

The panel noted that some of the targets are currently not sufficiently ambitious e.g. the embodied carbon target just hits a low rating regarding the LETI 2020 target, whereas the scheme will most likely not be completed before 2024.

The panel welcomed the TM59 calculations although these were currently only available for the new built elements. Some of the existing buildings have challenging elevations regarding overheating such as the Clock Tower and Clifton Pavilion, which need to be considered in more detail.

U-values identified for retrofit elements also appear - although welcomed - very ambitious and should be double-checked if these can be achieved in reality. 'The Bristolian's Guide to Solid Wall Insulation' is a useful guide to consider.

**CONNECTED** – Places grow and develop efficiently, bringing land use and movement together - making connected sociable places with good active travel and public transport accessibility

The overarching idea of a permeable site with a publicly accessible park has been developed further with further openings in the boundary wall although the panel felt that the permeability needs to be taken further. The perimeter blocks follow the boundary walls, and the idea of garden pavilions which sit in the landscape has been retained. There is still a clear tension between creating a welcoming park for the whole community and a walled housing development, and the pedestrian experience needs to be considered further to ensure all access points and routes appear inviting. The panel therefore questioned the extent of the wall and encouraged the team again to free themselves further from the constraints of the wall and be more ambitious, given the site will have a different use and be truly for all Bristol people. This will be discussed further under the 'Characterful' item.

The public access plan was useful although the out of hours access on the access plans needs to be thought through in more detail.

The transport concept in itself was not discussed at this review.

**HEALTHY & BIODIVERSE** – All scales of development contribute positively to nature recovery, bringing people into contact with trees and greenspaces and supporting health and well-being

The vision of connecting people and wildlife is highly commendable. It is important though to give the community as much access as possible to enjoy the gardens. A clear separation between public and private is useful, possibly even with clearer boundaries as currently shown to define the boundaries and have less reliance on informal defensible space. Balconies as private amenity space work well although the panel is not clear if the planting on balconies to showcase the greenery can and should be maintained by the management company.

'Health & Wellbeing' should feature in the overall cultural plan for the site.

The panel was pleased to see a significant improvement in biodiversity net gain. This item and soft landscaping/planting were not discussed in detail.

**CHARACTERFUL** – The character of different places in the West of England is understood and reflected. Distinctive high-quality places contribute culturally, socially and physically  
Identity and placemaking

As mentioned above and in the previous review and letter, the team should bear in mind that the site will change its purpose through a different use. The connections and relationships the development creates with its neighbouring context therefore should be thought of in a different way- opening itself up to its neighbours and the community. We encourage the project team again to challenge the extent of 'the wall' and break it up further as we are concerned about the impact it has on its context as a residential development. There are numerous examples of activating walls and making them more interesting/including them as part of a development which we encourage the design team to study, including incorporating front doors into it. The walls' heritage should be used to communicate a new story and further development of the site.

The walls certainly are part of the character of the site, but it will be more important what visitors see when they look beyond the wall and through the gates. Certain entrances, especially at the north-east corner still do not appear welcoming and dominated by barriers to the development. The view from College Road appears to be of a private lake house rather than an inviting vista to the community garden and the lake which needs to be addressed.

We are therefore still concerned that the vision statement of 'connecting with the community' has not been fully delivered through the design proposals.

#### Visual Impact and massing

The panel was disappointed that simple CGIs and contextual sections still had not been produced despite the team building a 3D model. The panel recommended this to use very much as a design tool to study the impact of the scheme from the outside rather than just creating high-end CGIs for the application and to attract future developers. The design team should be focusing less on an internalised development and better consider links and relationship to its neighbours.

The panel was pleased to see that the height has been slightly reduced on the north side although the current perimeter block proposals still appear unfriendly and not sufficiently modulated so they reinforce the sense of a physical perimeter barrier, impacting on the surrounding scale of buildings in the conservation area. Especially the north elevations appear unrelenting, too high and need breaking down further.

A contextual section will also help to understand the impact on the listed neighbouring College. The panel was concerned about the straight façade as originally submitted which appeared unrelenting and overpowering. The panel welcomed early revised sketches by P&P which broke down the mass visually and responded to the rhythm of the College façade. A similar approach should be taken for the north elevation.

Unfortunately, due to limited time the panel did not get a chance to discuss the layouts or all elevations in more detail.

The panel was very concerned that the scheme might be watered down once a developer/contractor comes on board. The panel strongly recommended to include further detail in the planning application such as 1:20 sections of the façade build up, depth of reveals, details of brick etc. to make this part of the approved planning application pack. Should changes be proposed later, BCC has a mechanism to control these. An outline specification should be included in the ERs to at least fix the quality of the proposals. The panel appreciated that the client does not want to be too prescriptive but was concerned that the overall quality might suffer if proposals are kept too vague.

**INCLUSIVE** – Communities are involved creatively in the development of proposals and their needs considered

It is highly commendable Bristol Zoological Society is keen to leave a legacy to support the creation of a new community. The panel is still concerned though that the site might not appear sufficiently welcoming. The presence of gates will always be a psychological barrier to true permeability of the site.

The panel was pleased to hear that a process will be put in place where a management board including representatives from BCC, BZS, residents, an arts consultant etc. will be involved in future decisions. Care should be taken to achieve the right representation. True connections with the community will help deliver the mission statement.

The panel also heard that there will be a charge for residents to pay towards the upkeep of the park. We felt that there needs to be clarity on the level of influence that future residents can and will have in order to be able to retain the public access model for the future. Also, a broader perspective looking further than the actual site is welcomed. We are concerned though if the planning system will be able to support this aspiration sufficiently and urge the BZS to include as much detail in the ERs as possible for the future developer and contractor.



## Summary

Thank you again for returning to Design West with your more detailed proposals for this important and well-loved site. We encourage you to align the proposals fully with the vision and create a more welcoming, permeable development which links to the neighbouring context - the treatment of the boundary walls will be key to this.

We are also still concerned that the principles and quality of the scheme are not sufficiently clearly set out to ensure the initial design intentions will be retained when a developer and contractor come on board. Please refer to the comments above for the detail.

We hope you found the advice contained in this letter helpful and are looking forward to seeing the proposals evolve further in dialogue with Bristol City Council during the planning process.

The guidance set out in our previous letters is also still valid.

Yours sincerely

Cora Kwiatkowski RIBA

Co-chair Design West

## Downs For People

Date: 19<sup>th</sup> August 2022

DOWNS FOR PEOPLE

For ever unenclosed, for all to enjoy

Comments on planning applications 22/0737/F and 22/02889/LA:  
development of Bristol Zoo's Clifton site for housing

Downs for People (DfP) co-ordinated objections to the zoo using the Downs off Ladies Mile as its main car park. It challenged the licensing of this use in the High Court in 2020: this led to a court order in 2021 establishing that no part of the Downs can be used for parking for non-Downs activities from the end of 2023. DfP members have unrivalled expertise in the history of zoo parking and examined the zoo's finances in relation to successive planning applications. We are sad the zoo is closing: our objective now is to ensure that the zoo's departure benefits those using the Downs for recreation as much as possible.

### Summary

Downs for People (DfP) has four comments on these proposals:

I. Strong statutory measures, not just planning conditions, will be needed to secure public access to the zoo grounds. If the zoo must close, Downs for People supports this application insofar as it may create public open space to complement what is available on the Downs. Recreational use in perpetuity cannot be secured by a planning condition or section 106 agreement. Something stronger, like dedication under section 16 of the Countryside and Rights of Way Act 2000 and/or designation as a town or village green under the Commons Act 2006, is required. In addition, the zoo should establish an endowment fund for future maintenance.

II. Parking history has been mis-represented as a reason for closure. In particular:

- 1) Visitor numbers have never been constrained by lack of parking: in its annual accounts the zoo has identified this only as a possible future risk.
- 2) DfP's successful High Court challenge did not result in the zoo being left with no parking. It still had its surface West car park. The zoo has decided to build housing on this. (A modest multi-storey car park there could have made up for the spaces lost elsewhere.) There is anyway still significant on-road parking in the streets around the zoo and on the Downs.
- 3) In 2019, before COVID struck, the zoo published a strategy to develop the Wild Place

Page | 69

as its main site and to keep the Clifton site as a local attraction. Parking for the Clifton site was not seen as a problem.

III. The zoo has exaggerated the fall in pre-COVID visitor numbers and its financial difficulties. The zoo's finances appear healthy in its annual accounts, with profits in the three years before COVID. It described itself as 'flourishing' when it last applied for planning permission in 2016/17. Visitor numbers may be lower than in the 1960s but have not fallen dramatically in recent years. The zoo's insurers have covered most of its COVID losses. There seems no compelling financial reason to close the Clifton site other than to make money to develop Wild Place.

IV. The constraints on the use of the Downs north of the zoo – and the potential of the land - need clarification. All the land between the zoo's north boundary and the main road, including the land outside the zoo's main entrance, is part of Clifton Down. Under the 1861 Downs Act, this land must be used for the public resort and recreation of Bristolians. It is also common land, to which there is a right of access on foot. The pedestrian route along the zoo boundary wall probably qualifies as a public right of way through long use. The recreational value of this land should be maximised. The creation of a grand entrance to the proposed conservation hub and the retention of a large car park (that could only be used by visitors to the Downs) would not achieve this. The construction of large buildings on the boundary of the land would reduce the recreational value of this part of the Downs.

#### Detail

##### I Public access to the zoo grounds

1.1 The significance of the gardens is eloquently described at para 4.31 (page 75) of the heritage statement. The zoo's proposals will significantly reduce the attractiveness of the gardens. The proposed public access would be some compensation: the gardens would complement the recreational uses of the Downs well.

1.2 Public access cannot be secured in perpetuity by planning conditions or s106 agreements: residents would be able to apply to have conditions amended or removed to increase their privacy and security.

1.3 Other ways of securing public access include:

- Restrictive covenants. Better but still inadequate. Assuming that it retains an interest in the land through ownership of the site of the proposed conservation hub, the zoo could sell the site with a restrictive covenant requiring public access. The weakness is that the zoo could agree to the covenant being removed at a later date, or an application could be made to the courts for the covenant to be removed.
- Rights of way. Much stronger. For linear routes only. The zoo and Bristol City Council, as the local highway authority, could make creation agreements to establish footpaths on the site ( see <https://www.ramblers.org.uk/advice/paths-in-england-and-wales/changes-to-the-pathnetwork/creating-a-right-of-way.aspx>). Once established, rights of way are hard to remove. .
- Right of access to all the site. Just as strong and would cover the lawns etc as well. Under section 16 of the Countryside and Rights of Way Act 2000, owners of land can dedicate it for public access in perpetuity. This is binding on subsequent owners.
- Designation as a town or village green. Also strongly protective. There are plenty of precedents in Bristol, including Canynge Square and the Mall Gardens in Clifton. The zoo can apply for voluntary registration under the Commons Act 2006. (See <https://www.oss.org.uk/what-do-wefight-for/village-greens-voluntary-registrationdedication-of-land-as-a-town-or-village-green-ofland-as-a-town-or-village-green/>).

1.4 The application proposes that the costs of maintaining the grounds should fall on residents. This will not guarantee the current high standards. The zoo needs to establish an endowment fund

of, say, £5million to achieve this.

## II Parking history

### (1) Past parking constraints

2.1 The documents submitted by the zoo rest heavily on assertions about the zoo's decline, quoted below from the planning statement. The same assertions are repeated in that statement at para 6.12 and in the design and access statement (page 10) :

" 1.3. Since the Zoo's peak in the 1960s, when approximately 1 million people visited the site each year, visitor numbers have decreased significantly to approximately 500,000 (precovid). This has resulted in the Society making a loss in recent years.

1.4. The primary reasons for this decline are the constrained scale of the site, which limits the Society's (the applicant's) ability to appropriately meet animals' needs, and the loss of parking provision serving the Zoo. "

2.2 This statement is not consistent with the zoo's last two applications for planning permission to park on the Downs; its reports on parking to the Downs Committee; or its annual accounts at <https://bristolzoo.org.uk/zoo-information/about-us/accounts-reviews-and-plans>.

2.3 We deal with the fall in visitor numbers and the zoo's finances more fully in the next section. On parking, the zoo has never claimed in its planning applications or reports to the Downs Committee that visitor numbers have decreased because of lack of parking provision. It has instead successfully argued for special concessions – such as five-hour parking on the roads on the Downs and near the zoo – and made unsubstantiated claims that its viability would be threatened if it were no longer allowed to use the Downs off Ladies Mile as its main car park. The zoo caused traffic chaos for many years by making no attempt to limit visitor numbers in line with the parking available. It even made a half price Groupon offer in 2015 that brought northwest Bristol to a halt.

2.4 In its annual reports to the Downs Committee, the zoo emphasised that it could easily manage with the (steadily reducing) parking provision planning committees allowed on the Ladies Mile site. Because of COVID, the site has not been used since 2019. The zoo's report to the Downs Committee for that year is attached. It notes that:

"During 2019, Bristol Zoo Gardens used the designated area of land off Ladies Mile for car parking on 22 days during the Easter school holidays, May bank holiday and Summer school holidays.

A total of 3,499 cars were parked, an average of 159 per day. As in previous years, the number of days used is comfortably within the days permitted. Parking was used on 4 fewer days than in 2018 and 509 fewer cars in total. "

2.5 The zoo's annual reviews and accounts from 2011 onwards do not attribute changes in visitor numbers to parking constraints. The annual accounts from 2013 onwards do, however identify pressure on parking as one of the principal future risks facing the zoo. The 2013 accounts were published in July 2014. Possibly coincidentally, one of DfP's members, a qualified accountant, had pointed out a year earlier that, if the financial viability of the zoo were considered materially dependent upon the Ladies Mile car park (as the zoo claimed in support of its planning application), this would have been identified as a risk in its audited annual financial statements. At that time it was not.

### (2) Consequences of High Court challenge

2.6 Downs for People successfully challenged the grant of a twenty-year licence to the zoo to continue to park on the Downs off Ladies Mile. This led to a court order last year that established no part of the Downs could in future be set aside for parking for activities that were not on the Downs. The order allowed the Ladies Mile site to continue in use until October 2022 and the zoo's North car park until the end of 2023.

2.7 The zoo's planning statement gives an inaccurate impression of the consequences. It says:

“ 6.14 Regarding parking, the loss of facilities that the Zoo has historically relied upon, are well documented. The parking on the Downs and\* off Ladies Mile, has reduced in recent years in accordance with the planning permissions granted. This left the Zoo primarily reliant on the North Car Park. However, this site sits on Downs land, and a recent High Court legal ruling has confirmed that use of both the North Car Park and Ladies Mile will be lost to the Zoo from 2024. In total, there are 340 spaces in the North Car Park and West Car Park, and 600 temporary spaces at Ladies Mile

6.15 As a result, from 2024 Bristol Zoo Gardens will have no car parking spaces available (on-street parking in the form of pay and display and the use of 36 parking permits only), which is insufficient to run a viable visitor attraction, irrespective of recent financial pressures”

\*the ‘and’ is presumably a typing error. There is just one site on the Downs, off Ladies Mile.

2.8. This is misleading: it underestimates the past and present parking available to the zoo. Further, it does not mention that the zoo has decided to sell its west car park, the only parking provision on its own land. The parking available to the zoo is:

- North car park. Taken from the Downs over decades. 180 spaces. Parking for non-Downs activities must end by 31 December 2023.
- West car park. Opened in 2002. 160 spaces. Zoo is selling site for housing.
- Downs off Ladies Mile. Area with space for 660 cars licensed since 1960s. Use grew, with the zoo seeking permission for 102 days in 1996 and often using more than the space allowed. Planning committees gradually reduced the annual allowance to 30 days in 2019. Zoo repeatedly promised to make arrangements that would end its use of the site. Parking for non-Downs activities must end by 1 October 2022.
- Parking on neighbouring roads. When a Residents’ Parking Scheme was introduced in 2015, the zoo successfully lobbied for a five-hour limit (the length of an average zoo visit) in these roads, rather than the three hours originally proposed. There are 330 metered spaces. At weekends and Bank Holidays, parking is free of charge both in these spaces and in the rest of the area covered by the Residents’ Parking Scheme.
- Parking on roads on the Downs. When the council introduced parking restrictions on the roads on the Downs in 2016, the zoo pressed successfully for the parking limit to be set at five hours instead of the four originally proposed, with no restrictions on Bank Holidays. There are 1550 spaces on the roads on the Downs.

2.9. The most obvious way for the zoo to deal with the loss of the North car park and the Ladies Mile site would have been to build a multi-storey West car park. It anyway has continuing access to 330 metered spaces and 1500 free spaces on weekdays and 1830 spaces at weekends. Further, it has repeatedly committed itself to reducing the need for parking but has done little about it. It has benefited from significantly improved local bus and train services but resisted introducing a park-and-ride service itself. More time has been spent drawing up travel plans than in implementing effective measures.

### III Pre-COVID plans

2.10 The suggestion that lack of parking required the closure of the Clifton site is at odds with the strategy Saving Wildlife Together, which the zoo published in June 2019 ( attached). This saw Wild Place developing further in the years to 2025 as a “global wildlife adventure”; meanwhile the Clifton site would become an exciting “animal discovery centre”, appealing to a more local visitor base. There were plans for significant capital investment at the Clifton site, not closure. There was no mention of parking problems. There was only recognition that transport should be an enabler, not a blocker, and that alternatives to car travel were needed (p16).

### III Visitor numbers and financial difficulties

3.1 The zoo’s annual reviews/accounts and its statements in support of its planning applications, do not support the assertion quoted in para 2.1 above that the zoo has made losses in recent years because visitor numbers have decreased to about 500,000. The decrease is attributed to the constrained scale of the site limiting the zoo’s ability to meet animal needs, as well as parking problems, but this is nowhere mentioned elsewhere.

3.2 The table below shows the visitor numbers given in the annual accounts, the increase/decrease from the previous year, and the explanation given for this.

Year	Visitors	% change	Reason given
2010	523000		
2011	579 613	+ 10.8	Fine weather and painted gorillas.
2012	589,552	+1.7	Animatronic DinoZoo
2013	554,494	- 5.9	Not clear. (More admission income though, from higher prices).
2014	528,036	-4.8	No DinoZoo.
2015	545,722	+3.3	Groupon promotion
2016	562,192	+3.0	Baby gorilla Afia
2017	523,166	-6.9	No baby gorilla
2018	*512,920	- 2.0	
2019	512,934	0.0	
2020	217,768	- 58	COVID
2021	313,146	+44	COVID

\* Originally recorded as 478,126, a drop of 8.6%. Corrected the next year.

3.3 While visitor numbers may be lower than in the 1960s, they were clearly steady for a long period. The foreword to the 2011 annual review referred to “strong visitor numbers”. In 2012 the zoo enjoyed “the best visitor numbers for over ten years”. When submitting its last planning application in 2016, the zoo declared that it was ‘flourishing’.

3.4 It is hard to detect any lasting financial problems in the zoo’s annual accounts. The ‘net movements in funds’ ie gains/losses for the Bristol Zoological Society as a whole have been:

- 2011 - £167k
- 2012 + £962k
- 2013 + £3.493m
- 2014 - £306k
- 2015 + £785k
- 2016 - £505k
- 2017 + £1.587m
- 2018 +£1.292m
- 2019 + £1.9m
- 2020 - £955k
- 2021 - £387k.

In the years immediately before COVID, the Society’s finances look very healthy.

3.5 When announcing closure of the Clifton site in November 2020, the zoo said that it had suffered operating losses in four of the last six years and declining visitor numbers. As shown above, both these statements are questionable. It also said: “The impact of Covid-19 has caused us to radically rethink our plans about the future and how we address the fundamental and persistent challenges that we face in order to save Bristol Zoological Society.” In its 2020 accounts, the zoo again blames

COVID for its abandoning the 2019 strategy which would have kept the Clifton site (para 2,10 above). But the zoo's accounts show – and the figures in para 3.4 confirm – that the zoo has been to a large extent protected from the impact of the pandemic by a £2.5 million payout from its insurers, as well as by the Government support available to furlough staff etc.

3.6 There seems no compelling financial reason to close the Clifton site other than to make money to develop Wild Place. Sale of the site was not thought necessary in 2019: it is not clear why it is now.

#### IV Constraints on the land north of the zoo boundary

4.1 The land between the wall marking the zoo's northern boundary and the main road, currently occupied by the zoo's North car park and the approach to its main entrance, is subject to a number of constraints. The planning application recognises this but does not always express the constraints correctly. These are:

- Part of Clifton Down. The land is all part of Clifton Down, which is owned by the Society of Merchant Venturers (SMV) and subject to the Clifton and Durdham Downs (Bristol) Act 1861. It is the Downs Act and not SMV ownership that prevents use of this land other than for “the public resort and recreation of the citizens and inhabitants of Bristol”. It cannot be built on. The land does not have to be used as a car park: if it is, only Downs users will be able to park there from 2024. This was spelt out in the court order that brought our High Court challenge to an end. Anyone who ignores the order will be in contempt of court. Equally the land does not have to be restored to grassland as the heritage statement suggests (fig 101). It cannot be used as a grand entrance to the new conservation hub ( fig 104) unless this is somehow of benefit to Downs users
- Common land. This has been common land “from time immemorial” (1861 Downs Act). This limits what can be done without specific permission from Defra's Secretary of State. It also means there is a statutory right of access on foot.
- Right of way. The planning application points out (page 130 of Heritage Statement) that there is an ‘unofficial’ pedestrian route along the zoo's boundary wall. This is the route the road followed, probably until 1828. This route would almost certainly qualify as a public right of way, certainly for pedestrians and possibly for cyclists and even cars. If designated as a right of way, the route will need to be left unobstructed, or changed by legal action.

4.2. The Downs Committee is currently considering the use of this land. Downs for People is pressing for it to be used in a way that adds most recreational value. It could create a walking route to rival the Promenade and use the open space for a variety of activities. Development within the zoo site, particularly along the north boundary wall, will impact on this site and on those walking to it from the higher parts of the Downs. The current proposed height and bulk of the buildings will produce some overshadowing and overlooking.

Downs for People

18 August 2022

#### Flood Risk Manager

Date: 28<sup>th</sup> July 2022

This is a good SuDS strategy for the site. I would recommend that the SuDS condition be applied to cover the detailed design once prepared and ready. There are still drainage surveys to be conducted and details to be confirmed but it does show that this development can be drained in a sustainable way and provide wider sustainability benefits. It also demonstrates that flooding occurring from the extreme future case rainfall event could be controlled in a suitable way. The only minor point standing out is the relatively small orifice diameter proposed for the online control at 64mm which could more readily lead to blockages and consequently cause flooding problems. This should be manageable with appropriate

Page | 74

controls such as filtration devices put in place to help prevent this though. A maintenance schedule with routine checks would also help enable this.

Suggested condition: B35A Sustainable Drainage System (SuDS) NB: Add relevant advice I058

No development shall take place until a Sustainable Drainage Strategy and associated detailed design, management and maintenance plan of surface water drainage for the site using SuDS methods has been submitted to and approved in writing by the Local Planning Authority. The approved drainage system shall be implemented in accordance with the approved Sustainable Drainage Strategy prior to the use of the building commencing and maintained thereafter for the lifetime of the development. Reason: To prevent the increased risk of flooding by ensuring the provision of a satisfactory means of surface water disposal is incorporated into the design and the build and that the principles of sustainable drainage are incorporated into this proposal and maintained for the lifetime of the proposal

### **Economic Development**

Date: 28<sup>th</sup> September 2022

While the applicants have largely addressed our comments made at pre-application stage, and while they have outlined the benefits to the city's wider economy, the proposal could be strengthened by being more explicit about the benefits to designated centres in the more immediate vicinity of the site

Date: 13<sup>th</sup> December 2022

The superseded Economic Benefits Assessment document represents a reasonable estimate of the potential economic benefits of the proposal.

### **Highways England (also referred to as National Highways)**

Date: 11<sup>th</sup> November 2022

22/02737/F - Redevelopment of site to include 196 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings at Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA Thank you for consulting National Highways on proposed revisions to the above application, the site of which is located approximately 5.5km south east of M5 Junction 18/18A, 7.2km south west of M5 Junction 17 and 2km west of M32 Junction 3. National Highways was previously consulted on application 22/02737/F in June 2022 and offered no objections as set out in our attached response dated 8 July 2022. The amendments generally comprise a reduction in dwellings from 201 to 196, and changes to building designs, materials and pedestrian accesses. National Highways is satisfied these revisions are unlikely to result in an adverse impact on the safe operation of the strategic road network and as such continue to recommend no objections to application 22/02737/F as AMENDED. Kind regards, Planning Manager (Highways Development Management), Operations National Highways | Ash House | Falcon Road | Sowton Ind. Estate | Exeter | EX2 7L

### **Historic Buildings And Places**

Date: 27<sup>th</sup> July 2022

FAO: Case Officer

Address: Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA

Application Ref: 22/02889/LA

Proposal: Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure. Works to listed building including: access-works to the Guthrie Road entrance gates; the conversion of the Entrance Lodge to facilitate community floorspace, the residential conversion of the Giraffe House, and various restoration and refurbishment works to the Aquarium (former Bear Pit), Monkey Temple, and Birds of Prey Aviary to secure their future as part of accessible landscaped gardens.

Statutory Remit: Historic Buildings & Places (HB&P) is the working name of the Ancient Monuments Society, a registered charity in England and Wales (no. 209605). We are a consultee on all Listed Building Consent applications involving an element of demolition, as required by the Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.

Comments: Thank you for consulting HB&P on this application. I apologise for the delay in responding. While the departure of the Zoo from this site will harm the overall historic and communal value of the Gardens, HB&P acknowledges that an element of residential development is acceptable to secure the future of the site. However, we do have concerns with some aspects of the application.

We welcome the proposals to retain the ‘parkland’ setting around the central lake as well as the removal of later unsympathetic accretions to the designated and local heritage assets, and their refurbishment as parkland follies and dwellings.

We agree that the location of the new apartment buildings is best located to the perimeter of the site, as proposed, however, their height and scale is excessive and harmful to the setting of the listed Zoo buildings and to the character of the conservation area. The existing buildings to be demolished are small scale and of different heights with spaces between each building, whereas the proposed buildings present a solid built form extending along each frontage, with little permeability beyond the formal entrances. The design and massing of these new buildings, particularly those on Guthrie Street opposite the listed Clifton College buildings, don’t appear to fit well within the streetscapes of the conservation area, and at up to 6 stories, are too tall for the area. While not a listed building, the Art Deco clock building contributes to the story and development of the zoo over time. The roof extension is clumsy and doesn’t respect the elongated proportions of the building, harming its appearance. Retaining it in its existing form would be preferable, and would provide a needed gap between the taller new buildings to either side.

While we don’t oppose a modern architectural design, the design of the perimeter buildings should be reconsidered to better reflect the modulation, scale and rhythm of the neighbouring development to ensure the new development will contribute to and enhance the historic interest and significance of the conservation area.

Relevant NPPF (2021) policy considerations are:

- Paragraph 195: “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take

Page | 76



this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal".

- Paragraph 199: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation".
- Paragraph 200: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification."

Chapter 16 of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990 establish the requirements to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. I would be grateful if we could be informed of the outcome when this becomes available.

Regards

Ross Anthony

### Historic England 1 of 3

Date: 29<sup>th</sup> June 2022

Arrangements for Handling Heritage Applications Direction 2021 & T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990  
BRISTOL ZOO GARDENS GUTHRIE ROAD BRISTOL BS8 3HA  
Application Nos 22/02889/LA & 22/02737/F

Thank you for your letters of 14 June 2022 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

#### Summary

Generally, Historic England finds much to admire in the proposed development, which we feel on the whole is a sensitive response to its historic context. However, a considerable aspect of the site's significance is bound up in its continued use as a Zoo since the early 19th century, and its closure will have a pronounced harmful impact on the significance of the site.

The loss of the Zoo from the site is partially mitigated through good design, retention of much of the historic planting and landscape, and allowances made for future public access. There are some heritage benefits to the proposals, especially the removal of later accretions to the listed structures, and the restoration of those buildings.

There is room for improving the proposed design of the alterations to the art-deco café and the proposed building facing Guthrie Road, in order to preserve and enhance the character and appearance of the surrounding conservation area. We recommend you request revisions to these discrete aspects of the proposals prior to determination of the application.

While not directly related to this application, we note the recent Court Order quashing Planning Permission for residential development on the Zoo's West Car Park, outside the boundary of this application. We encourage your authority to consider how development proposals for the College Road site might be brought forward in conjunction with these plans.

Page | 77

## Significance

Bristol Zoological Gardens are the earliest provincial Zoo in England, having opened in 1836. The gardens, a locally-designated historic park, have been continually upgraded and adapted since opening, although the original design principles - a long terrace walk at the North side of the site, a large water feature in the centre, and exhibits in contained areas around the site perimeter - remain legible. The site is of considerable heritage significance.

The site is within the Clifton and Hotwells Conservation Area, and contains a number of Grade II listed buildings, some listed very recently following a review of the site by my colleagues in our listing team. The entrance lodges, south gate, and former giraffe house have long been listed. The bear pit, monkey temple and birds of prey aviary have recently also been listed at Grade II. There are a number of unlisted structures which make a positive contribution to the character and appearance of the conservation area, including the central pavilion, the forest of birds, the art-deco tearoom and the Clifton pavilion.

A great part of the Zoo site's significance is in its communal value; the meaning of the place for the people who relate to it, or for whom it figures in their collective experience or memory. These values are to a degree associated with the attractive landscaped environment of the zoo but are perhaps more associated with the activity of the place, than its physical fabric.

There is, however, considerable aesthetic and historic value in the Zoo and its environs. It is an attractive garden landscape, the original early 19th century layout of which is still discernible. The high boundary walls, diverse architecture and lush, verdant character of the planting make for a site of insular character that is markedly different from the surrounding upmarket suburbs of Clifton.

## Impact

In considering proposals for the redevelopment of the site, the great challenge is how the character of the site could be preserved and enhanced once its *raison d'être* - the animals - have departed.

The Zoo would close, and its operations would transfer to the existing satellite operation of Bristol Zoo at the Wild Place, near Cribbs Causeway. The entire site would be repurposed as a new residential enclave, with the majority of the existing gardens retained and provision made for public access. The Zoo would retain a small education offering on the site in the existing gatelodges and reception building, which would be repurposed as the "Clifton Conservation hub".

A series of residential buildings would be constructed around the perimeter of the site, mainly in areas presently occupied by animal enclosures. We are encouraged by the approach taken to the design of these proposed buildings. They are simple in form, but carefully modulated to avoid large unrelieved elevations. Their proposed elevations strike a balance between preserving the inward-looking, walled character of the Zoo site, and providing visual interest and engagement with the surrounding streets.

The proposed buildings would be built of buff brick with deep punched openings, and a rusticated feel at lower levels referencing the existing random rubble perimeter walls. At upper levels a smoother texture would be used. Planting would be designed into the buildings to soften their appearance and acknowledge the green character of the site and the Downs, opposite. Playful decorative motifs - animal imagery in tiled motifs and fret-cut metalwork - would be applied to reference the site's previous use.

The scale and massing of the proposed new buildings is generally an appropriate response to the historic context. They would not significantly exceed the height set by the established surrounding townscape. The proposed apartment block facing Guthrie Road differs from the rest of the new-build accommodation in that it will have a frontage that addresses the surrounding roads. It is opposite the Grade II\* listed Clifton College buildings, and there needs to be a balance between a building which is clearly part of the family of new buildings but also integrates with the surroundings. This building would benefit from further refinement to break its massing and perhaps to better reference the characteristic defined bay rhythms of the surrounding buildings.

A series of new-build houses would be constructed around the southern edge of the lake, and adjacent to the forest of birds. In contrast to the subtle design of the perimeter blocks, these would be of a more flamboyant aesthetic with steeply-pitched roofs, eye-catching materials, and feature large windows which draw upon the large openings of the listed former giraffe house for architectural reference. The energetic architecture of the proposed new-build houses is, in our view, an appropriate response to the 'otherworldly' character of the Zoo site.

Existing buildings within the site would be converted, where possible, to residential use. The existing central pavilion/former museum would be sensitively adapted, with modern accretions removed. A similarly sensitive restoration and conversion would be undertaken at the Forest of Birds and the Clifton pavilion and we endorse this approach, which will preserve the historic buildings and provide them with a beneficial use.

It is proposed to adapt and extend the art-deco cafeteria building, removing its rather sprawling later 20th century extensions but adding a two-storey rooftop extension. We feel the proposed two-storey rooftop extension would rather overwhelm the architecture of the existing building and recommend that this element of the design is revised. A single-storey upward extension here is likely to allow the aesthetic of the existing building to remain uncompromised, whereas the present proposal for two additional storeys would, we feel, have a harmful impact.

Unsympathetic extensions would be removed from the listed former bearpit, and it would act as a viewing platform for site visitors. The listed birds of prey aviary would be adapted as a seating area. The monkey temple would be restored and continue to act as an attractive landscape folly. We are pleased to support these aspects of the proposals.

We regret the need for vehicles to enter the site post-redevelopment. Part of the site's character is derived from its traffic-free environs, and the movement of vehicles and surface car parking will be a detracting influence. While the majority of car parking is accommodated in undercroft areas and car ports, a small number of surface car parking areas are proposed. Great care will be needed in the design of shared-surface streets to prevent ad-hoc parking of vehicles and ensure the ability of pedestrians to promenade around the site is undiminished.

The ability for visitors to enter the site, free of charge, post-redevelopment, is a significant heritage benefit. We understand that maintenance of the gardens will be funded through a service charge on new residents; a necessary feature given the high-maintenance nature of the Zoo landscaping. We would expect your authority to secure this public access through legal agreement, should you be minded to recommend approval of this planning application.

It is important that users of the gardens and new residents are able to understand and interpret the history of the site. Details of an interpretation strategy should be the subject of a planning condition on

any approval. We would encourage an imaginative response to the interpretation of the site in discussion with other partners and stakeholders.

#### Policy

The closure of the Zoo will cause some harm to the character and appearance of the Clifton and Hotwells Conservation Area. That harm is less than substantial, but you should not immediately proceed to the “balancing exercise” of weighing benefits versus harm.

The National Planning Policy Framework (NPPF) is very clear on this. Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation, irrespective of whether any potential harm amounts to substantial harm, or less than substantial harm to its significance. Paragraph 200 goes on to advise that any harm to the significance of a designated heritage asset should require clear and convincing justification.

In other words, if there is a means by which the benefits of the scheme can be realised while lessening the harm to the historic environment (or potentially avoiding harm altogether), the justification is not clear and convincing.

We consider that relatively minor design changes are needed to the café extension and the Guthrie Road building. If these amendments were secured, we may be in a position to acknowledge that the harm has been minimised as far as possible, which could then allow you to proceed to the balancing exercise set out under NPPF paragraph 202.

NPPF paragraph 206 is also of relevance to these proposals, stating that “Local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

While the impact of the Zoo closure on the conservation area is harmful, we consider that the detailed proposals for the individual heritage assets within the Zoo site will enhance, and better reveal, their significance. With the minor adjustments to the scheme as suggested above, the scheme has the potential to comply with NPPF paragraph 206.

#### Position

Revisions to the design of the café extension and the Guthrie Road building could allow Historic England to support these proposals. We are not in that position yet, however, and have some concerns over the impact of the proposals on the character and appearance of the Clifton and Hotwells Conservation Area. We understand the Zoo’s intention to secure planning permission and sell their site with an extant consent. Our potential support is based upon the development being executed in accordance with the presented vision, and the possibility of a later exercise in value engineering should be avoided at all costs.

#### Recommendation

Historic England has concerns regarding the applications on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 199, 200 and 206 of the NPPF.

Yours sincerely

Page | 80

Simon Hickman  
Principal Inspector of Historic Buildings and Areas

## Historic England 2 of 3

Date: 24<sup>th</sup> November 2022

Arrangements for Handling Heritage Applications Direction 2021 & T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990  
BRISTOL ZOO GARDENS GUTHRIE ROAD BRISTOL BS8 3HA Application Nos 22/02889/LA & 22/02737/F

Thank you for consulting Historic England on amendments to the listed building consent and planning applications to redevelop the site of Bristol Zoo, Clifton, for residential purposes. On the basis of this information, we offer the following advice to assist your authority in determining the applications.

Our previous advice We wrote to you on 14 June 2022 in response to the original submissions. We advised that while we generally found the proposals to be a sensitive response to their historic context, a considerable aspect of the site's significance is bound up in its continued use as a Zoo since the early 19th century. The closure will have a pronounced harmful impact on the significance of the site. We advised that the loss of the Zoo from the site is partially mitigated through good design, retention of much of the historic planting and landscape, and allowances made for future public access. There are some heritage benefits to the proposals, especially the removal of later accretions to the listed structures, and the restoration of those buildings. We advised that there was room for improving the proposed design of the upward extension to the clock tower building and the façade of the proposed building facing Guthrie Road, in order to preserve and enhance the character and appearance of the surrounding conservation area. These amendments respond to those comments.

### The amended proposals

The amended proposals for the clock tower building would see the proposed rooftop extension reduced from two storeys to one. We felt the previous proposals for a twostorey rooftop extension would overwhelm the architecture of the existing building beneath. The revised proposed for a single-storey upward extension now allows the aesthetic of the existing building to remain uncompromised and addresses our previous concerns.

We expressed reservations about the design of the proposed building fronting Guthrie Road in our previous advice. This building will have a frontage that addresses the surrounding roads. It is opposite the Grade II\* listed Clifton College buildings. We suggested that this building would benefit from further refinement to break its massing better reference the characteristic bay rhythms of the surrounding buildings.

In response to our comments, the design of the proposed Guthrie Road building has been revised. A defined bay rhythm has been introduced to the Guthrie Road elevation of the proposed building, which in our view successfully references the character of surrounding properties. We feel the revised proposals address the need to strike a balance between a building which is clearly part of the family of new buildings on the Zoo site, but also integrates with the conservation area context of surrounding streets.

The proposed building fronting the Northern boundary of the site has been revised in elevation. We did not make detailed comments on this building in our previous advice and do not propose to here, other

than to record that the proposed amendments are an improvement when compared against the previous scheme.

In response to comments raised by other stakeholders, it is now proposed to make adjustments to the boundary wall at the North East corner of the site to encourage public access and increase visual permeability. While we have previously advised that the inward-looking character of the site with its solid perimeter wall is an important aspect of its character, we understand the desire to make the site more permeable. We feel the revised proposals balance the preservation of a walled perimeter with the desire to invite users to enter the site, and do not oppose these revised proposals.

#### The planning balance

The proposals will still cause harm to the character and appearance of the Hotwells and Clifton Conservation Area. A significant part of that harm is derived from the loss of the Zoo from the site, which it appears cannot be avoided as the site is no longer compatible with modern standards of animal welfare.

The introduction of vehicular traffic into the site will have a marked adverse impact on its character and appearance. As we have noted previously, the traffic-free nature of the gardens contributes to their tranquillity and sense of “otherworldliness”. You will need to be satisfied that vehicle movements have been kept to the absolute minimum necessary to service the proposed accommodation.

The site is not allocated in the statutory local plan, and as such your authority will need to carefully consider both the principle of residential development and the quantum of new homes. If you consider both the principle and quantum acceptable, our view is that the harm has been mitigated as far as possible through good design.

This allows you to proceed to the “planning balance” of weighing the less than substantial harm to the character and appearance of the conservation area against any wider public benefit offered by the proposals, in accordance with National Planning Policy Framework paragraph 202.

There are a number of heritage benefits associated with the proposals which should be considered alongside any wider public benefits. These include the retention and restoration of all the listed structures within the site, and the provision of free public access to the retained garden areas. We continue to encourage your authority to secure this public access through legal agreement, should you be minded to recommend approval of these applications.

As per our previous advice, we also recommend that details of a strategy to interpret and understand the history of the site should be subject to an appropriately worded planning condition, if you are minded to recommend approval.

#### Recommendation

Historic England has no objection to the applications on heritage grounds. Your authority should take these representations into account in determining the applications. If there are any material changes to the proposals, or you would like further advice, please contact us.

Please advise us of the decision in due course. Yours sincerely Simon Hickman Principal Inspector of Historic Buildings and Areas

### Historic England 3 of 3

Date: 1<sup>st</sup> February 2023

Thank you for your letter of 17 January 2023 regarding further information on the above application for planning permission. The additional information on which you have consulted us consists of additional justification for the proposals, mainly in response to comments made by other interested parties. There are also minor amendments to blocks E1, E2, and E3, in order to address concerns about overlooking. The additional information and minor amendments have no material bearing on the advice which we have previously given. I therefore refer you to our previous letter of 23 November 2022 (our reference L01508753), the comments of which still stand.

Yours sincerely Simon Hickman Principal Inspector of Historic Buildings and Areas

### Housing Enabling Team 1 of 3

Date: 15th July 2022

#### Affordable Housing Requirement

The Council's planning policies for affordable housing in Bristol are set out in Policy BCS17: Affordable Housing Provision in the Core Strategy Local Plan (Adopted June 2011), and Policy DM3: Affordable Housing Provision: Smaller Sites in the Site Allocations and Development Management Policies Local Plan (Adopted July 2014). Further guidance on the Council's affordable housing policies is set out in the Affordable Housing Practice Note 2018 (AHPN). The site falls within Clifton ward, which is in Inner West Bristol. In accordance with policy BCS17 the site is required to deliver 40% affordable housing, which is 80.4 units out of the 201 units being delivered. However, the site is eligible to make use of the 'Threshold' approach to BCS17 added by the AHPN that applies to the Inner East and West areas. This would require the site to deliver a minimum of 20% affordable housing providing the applicant agrees to certain criteria. In order to take this 'Fast Track' route the applicant will agree to:

- Commence the development of the scheme within 18 months of the permission being granted;
- A viability testing process if no confirmation of commencement of the development of the scheme has been received within 18 months of the date the planning permission was granted.

The applicant has suggested that they will take this option and offered 41 units as affordable housing which is compliant with policy.

#### Tenure

The current tenure requirement is 75% Social Rent and 25% Affordable Homeownership products. The applicant has delivered on this tenure split in their present proposal. As the application stands there is a proposed 11 First Homes and 30 Social Rent units. This is acceptable and a compliant application in terms of tenure however, given the property values in the area and the national policy requirement that First Homes after discount shall not exceed £250,000 it would be the Strategy and Enabling Team's preference to have these amended to shared ownership units as we believe this will make these units more affordable to more people. If this was something the applicant would consider it would be most welcome, albeit not essential to be policy compliant. The Affordable Housing Statement submitted with the planning application does not include proposed sale values for each house type/ size which would be helpful to understand the affordability of these units and give a clearer steer of how any affordable homeownership units may work on the site. Unit size and type It is expected that the affordable housing contribution will address identified housing needs and reflect the proportions of property types and sizes in the overall scheme and contribute to balanced and sustainable communities in Bristol. The current application does not address need in this way. There is little affordable housing in Clifton ward and while this contribution is welcomed, the current proposal does not reflect the property types and sizes across

Page | 83

the scheme at present, or the affordable housing need as set out in the Local Housing Needs Assessment for Bristol. The applicant has proposed 30 1-bed units and 11 2-bed units across the affordable tenures. This will not meet family accommodation need in the area and as a consequence, we do not feel it acceptable. What affordable housing is already available in Clifton is already predominantly 1 and 2- bed flats and we would like to see this development contribute to a greater mix in unit sizes. Were the application to reflect proportionately the needs of Bristol and the area's particular need for family housing we would propose the development offers a size mix as illustrated below: Size Number 1bed 13 2bed 12 3bed 12 4bed 4 Whilst the Strategy and Enabling team understand that viability may make this precise split not feasible, we would like to see the applicant offer a greater mix of property sizes, including some 3 or 4- bed houses. This would broaden the range of affordable housing on offer in the area and support the reduction of wait times which are generally far longer for larger properties. As the plans are at present there is also one First Home unit among the social rented units which we would advise against. This would make management of the block more complex and a challenge for any Registered Provider (RP) who were to take on these properties as it would add an extra leaseholder to the mix. This is particularly challenging if the scheme were to stay with First Home provision as these are not expected to be managed by an RP but sold directly to eligible people. This issue may fall away if the applicant amends their affordable units to reflect our proposed mix as mentioned above. We welcome and can confirm the applicants present application does meet Nationally Described Space Standards across the affordable units. There is a high demand in the City for affordable housing for people with disabilities. The 2018 Urban Living SPD recommends that 90 per cent of new build housing meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation M4(3) 'wheelchair user dwellings. Whilst the applicant has not reached the Urban Living SPD recommendations for accessible dwellings, they have met Policy DM4 which requires 2% of new housing with over 50 units to be designed as wheelchair user dwellings. We note that two of the M4(3) units are on the first and second floor, we would like to see confirmation that the pathway to these flats is fully accessible for a wheelchair. This should include automatic doors throughout the pathway from the entrance of the block to the front doors of the M4(3) flats. We would also like these plans to be reviewed by our Accessible Homes Team to confirm that the dwellings will meet a lettable standard to a wheelchair user. Under the present proposal, one of the 4 proposed M4(3) units is for private sale. Unless the applicant is actively intending to market to someone with adaptable needs, we'd recommend this is amended to become an affordable housing unit where we are confident we would be able to find someone who requires an accessible home.

#### Car Parking

At present it appears that the only parking offered for the affordable housing is for the accessible units. It is understood that given the central location of the site and the good transport links that the applicant is pushing to reduce cars on this site however, we would ask that a reasonable proportion of the parking spaces on site are made available to affordable housing tenants who are car users. This could perhaps be done on an application or permit basis. We would ask that the accessible housing parking spaces are secured via the Section 106 agreement to the units they are allocated to.

#### Distribution of units:

The council seeks fully integrated mixed tenure housing schemes and will support a reasonable level of clustering, particularly for any proposed flatted units, to enable small self-contained blocks. The location of the units is to be agreed with the Strategy and Enabling Team. Buildings should be designed to be tenure blind.

#### Approved Housing Provider



The developer is expected to provide affordable homes on site without any public subsidy. The affordable units should be transferred to a Registered Provider who is a member of the Homes West partnership. Rents & Service Charges Rents for Social Rented units should be set according to the relevant government formula, further information is here. The service charge is the amount payable on an affordable housing unit in addition to the rent/mortgage due. It should include all estate management charges, ground rents, services, repairs, regular maintenance items such as cleaning and grounds keeping, and the insurance of the building. Sinking funds may be charged additionally to service charges. Sinking Charges should only be set to recover the replacement costs of items or areas of the building at their expected end of 'life' as part of programmed repairs for the building. To ensure the relative affordability of units, total service charge costs should not exceed £650 for an affordable unit. This figure is benchmarked to 2018 and can be inflated by CPI annually. The total costs of rent + service charges for all affordable units must not exceed the current Local housing Allowance rates, this may mean that the services charges cannot be raised in certain years. Early consultation is recommended, as good design can overcome the need for high service charges. Where schemes are facing particular difficulties remaining within the cap, such as, but not limited to, needing additional requirements through the planning process, or delivering a complex site with additional costs, exemptions can be requested via the Strategy and Enabling team to raise the cap level. These will be reviewed on a case-by-case basis and should be requested at the earliest possible date in the development process. Developers/ development management companies must not make profit on service charges and can only charge costs that are reasonable to the services they deliver.

#### Enabling Fee:

An Enabling Fee will be payable when each affordable home is substantially completed. These fees are designed to maximise affordable housing delivery in the city by assisting registered providers with support on planning, property and highway issues. A fee of £550 per affordable home index linked from 1 October 2017 will apply. The fee is paid to the Council on substantial completion of each of the affordable homes and applies to Social Rent, Affordable Rent, Intermediate Rent and other Intermediate affordable housing tenures procured through s106 negotiations and delivered without public subsidy or through re-provision/remodelling, extra care housing and 100% affordable housing schemes

### Housing Enabling Team 2 of 3

#### Affordable Housing Requirement

The Council's planning policies for affordable housing in Bristol are set out in Policy BCS17: Affordable Housing Provision in the Core Strategy Local Plan (Adopted June 2011), and Policy DM3: Affordable Housing Provision: Smaller Sites in the Site Allocations and Development Management Policies Local Plan (Adopted July 2014). Further guidance on the Council's affordable housing policies is set out in the Affordable Housing Practice Note 2018 (AHPN). The site falls within Clifton ward, which is in Inner West Bristol. In accordance with policy BCS17 the site is required to deliver 40% affordable housing, which is 80.4 units out of the 201 units being delivered. However, the site is eligible to make use of the 'Threshold' approach to BCS17 added by the AHPN that applies to the Inner East and West areas. This would require the site to deliver a minimum of 20% affordable housing providing the applicant agrees to certain criteria. In order to take this 'Fast Track' route the applicant will agree to:

- Commence the development of the scheme within 18 months of the permission being granted;
- A viability testing process if no confirmation of commencement of the development of the scheme has been received within 18 months of the date the planning permission was granted.

The applicant has suggested that they will take this option and offered 41 units as affordable housing which is compliant with policy.

#### Tenure

The current tenure requirement is 75% Social Rent and 25% Affordable Homeownership products. The applicant has delivered on this tenure split in their present proposal. As the application stands there is a proposed 11 First Homes and 30 Social Rent units. This is acceptable and a compliant application in terms of tenure however, given the property values in the area and the national policy requirement that First Homes after discount shall not exceed £250,000 it would be the Strategy and Enabling Team's preference to have these amended to shared ownership units as we believe this will make these units more affordable to more people. If this was something the applicant would consider it would be Strategy & Enabling Planning Consultation Response: Bristol Zoological Gardens, College Road, Clifton, BS8 3HA Planning Application Number: 22/02737/F most welcome, albeit not essential to be policy compliant. The Affordable Housing Statement submitted with the planning application does not include proposed sale values for each house type/ size which would be helpful to understand the affordability of these units and give a clearer steer of how any affordable homeownership units may work on the site. Unit size and type It is expected that the affordable housing contribution will address identified housing needs and reflect the proportions of property types and sizes in the overall scheme and contribute to balanced and sustainable communities in Bristol. The current application does not address need in this way. There is little affordable housing in Clifton ward and while this contribution is welcomed, the current proposal does not reflect the property types and sizes across the scheme at present, or the affordable housing need as set out in the Local Housing Needs Assessment for Bristol. The applicant has proposed 30 1-bed units and 11 2-bed units across the affordable tenures. This will not meet family accommodation need in the area and as a consequence, we do not feel it acceptable. What affordable housing is already available in Clifton is already predominantly 1 and 2- bed flats and we would like to see this development contribute to a greater mix in unit sizes. Were the application to reflect proportionately the needs of Bristol and the area's particular need for family housing we would propose the development offers a size mix as illustrated below:

Size	Number
1bed	13
2bed	12
3bed	12
4bed	4

Whilst the Strategy and Enabling team understand that viability may make this precise split not feasible, we would like to see the applicant offer a greater mix of property sizes, including some 3 or 4- bed houses. This would broaden the range of affordable housing on offer in the area and support the reduction of wait times which are generally far longer for larger properties. As the plans are at present there is also one First Home unit among the social rented units which we would advise against. This would make management of the block more complex and a challenge for any Registered Provider (RP) who were to take on these properties as it would add an extra leaseholder to the mix. This is particularly challenging if the scheme were to stay with First Home provision as these are not expected to be managed by an RP but sold directly to eligible people. This issue may fall away if the applicant amends their affordable units to reflect our proposed mix as mentioned above. We welcome and can confirm the applicants present application does meet Nationally Described Space Standards across the affordable units. There is a high demand in the City for affordable housing for people with disabilities. The 2018 Urban Living SPD recommends that 90 per cent of new build housing meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation M4(3)

'wheelchair user dwellings. Whilst the applicant has not reached the Urban Living SPD recommendations for accessible dwellings, they have met Policy DM4 which requires 2% of new housing with over 50 units to be designed as wheelchair user dwellings. We note that two of the M4(3) units are on the first and second floor, we would like to see confirmation that the pathway to these flats is fully accessible for a wheelchair. This should include automatic doors throughout the pathway from the entrance of the block to the front doors of the M4(3) flats. We would also like these plans to be reviewed by our Accessible Homes Team to confirm that the dwellings will meet a lettable standard to a wheelchair user. Under the present proposal, one of the 4 proposed M4(3) units is for private sale. Unless the applicant is actively intending to market to someone with adaptable needs, we'd recommend this is amended to become an affordable housing unit where we are confident we would be able to find someone who requires an accessible home.

**Car Parking** At present it appears that the only parking offered for the affordable housing is for the accessible units. It is understood that given the central location of the site and the good transport links that the applicant is pushing to reduce cars on this site however, we would ask that a reasonable proportion of the parking spaces on site are made available to affordable housing tenants who are car users. This could perhaps be done on an application or permit basis. We would ask that the accessible housing parking spaces are secured via the Section 106 agreement to the units they are allocated to.

**Distribution of units** The council seeks fully integrated mixed tenure housing schemes and will support a reasonable level of clustering, particularly for any proposed flatted units, to enable small self contained blocks. The location of the units is to be agreed with the Strategy and Enabling Team.

**Buildings should be designed to be tenure blind.**

**Approved Housing Provider** The developer is expected to provide affordable homes on site without any public subsidy. The affordable units should be transferred to a Registered Provider who is a member of the Homes West partnership.

**Rents & Service Charges** Rents for Social Rented units should be set according to the relevant government formula, further information is here. The service charge is the amount payable on an affordable housing unit in addition to the rent/mortgage due. It should include all estate management charges, ground rents, services, repairs, regular maintenance items such as cleaning and grounds keeping, and the insurance of the building. Sinking funds may be charged additionally to service charges. Sinking Charges should only be set to recover the replacement costs of items or areas of the building at their expected end of 'life' as part of programmed repairs for the building. To ensure the relative affordability of units, total service charge costs should not exceed £650 for an affordable unit. This figure is benchmarked to 2018 and can be inflated by CPI annually. The total costs of rent + service charges for all affordable units must not exceed the current Local housing Allowance rates, this may mean that the services charges cannot be raised in certain years. Early consultation is recommended, as good design can overcome the need for high service charges. Where schemes are facing particular difficulties remaining within the cap, such as, but not limited to, needing additional requirements through the planning process, or delivering a complex site with additional costs, exemptions can be requested via the Strategy and Enabling team to raise the cap level. These will be reviewed on a case-by-case basis and should be requested at the earliest possible date in the development process. Developers/ development management companies must not make profit on service charges and can only charge costs that are reasonable to the services they deliver.

#### Enabling Fee

An Enabling Fee will be payable when each affordable home is substantially completed. These fees are designed to maximise affordable housing delivery in the city by assisting registered providers with support on planning, property and highway issues. A fee of £550 per affordable home index linked from 1 October 2017 will apply. The fee is paid to the Council on substantial completion of each of the affordable homes and applies to Social Rent, Affordable Rent, Intermediate Rent and other Intermediate affordable housing tenures procured through s106 negotiations and delivered without public subsidy or through re-provision/remodelling, extra care housing and 100% affordable housing schemes

Bethany Albrecht

### Housing Enabling Team 3 of 3

Date: 16<sup>th</sup> March 2023

#### Affordable Housing Requirement

The Council's planning policies for affordable housing in Bristol are set out in Policy BCS17: Affordable Housing Provision in the Core Strategy Local Plan (Adopted June 2011), and Policy DM3: Affordable Housing Provision: Smaller Sites in the Site Allocations and Development Management Policies Local Plan (Adopted July 2014). Further guidance on the Council's affordable housing policies is set out in the Affordable Housing Practice Note 2018 (AHPN).

The site falls within Clifton ward, which is in Inner West Bristol. In accordance with policy BCS17 the site is required to deliver 40% affordable housing, which is 78.4 units out of the 196 units being delivered. However, the site is eligible to make use of the 'Threshold' approach to BCS17 added by the AHPN that applies to the Inner East and West areas. This would require the site to deliver a minimum of 20% 39.2 (40) affordable housing providing the applicant agrees to certain criteria. In order to take this 'Fast Track' route the applicant will agree to:

- Commence the development of the scheme within 18 months of the permission being granted;
- A viability testing process if no confirmation of commencement of the development of the scheme has been received within 18 months of the date the planning permission was granted.

The applicant has suggested that they will take this option and offered 40 units as affordable housing which is compliant with the 'Affordable Housing Practice Note' fast track option.

#### Tenure

The applicant has currently offered the Council's requirement is 75% Social Rent and 25% 'First Homes' which is acceptable. Ordinarily we would wish to see a mix of property types, however to remain within the £250k cap on First Homes, due to house prices in the area, it is understood why 1 bedroom properties have been selected, to remain within the cap. As the application stands there is a proposed 10 First Homes which are located in Block E and 30 Social Rent units in Block S.

The City Council seeks to secure affordable housing that is well integrated within a mixed tenure development. Where high density flatted developments occur, the Council has needed to offer some flexibility to Registered Providers where they have found it easier to ensure affordability by having control of common areas in one block and the minimisation of service charges. That said, where opportunities exist and where a development comprises of flats and houses it remains the Council's preference to see a range of different size, type of dwellings, integrated across the whole development.

The Council acknowledge that due to the many constraints including heritage matters relating to the former Bristol Zoo site that the resultant design has fewer opportunities to incorporate family homes as the Council would have wished. On this occasion for the reasons indicated, the Council is willing to accept the provision of family apartments and given the layout of the development, accept on this occasion, (as with high density developments) that the affordable housing is spread between three blocks.

#### Unit size and type

There is little affordable housing in Clifton ward and while this contribution does not provide the ideal range of dwelling types, the development goes some way in providing much needed affordable housing in the area.

Page | 88

The affordable housing at the site is split across three separate blocks. The S1 block contains 30 units comprising 75% of the scheme. The remaining 25% of affordable units in the form of First Homes are distributed across separate blocks within E2 and E3 and are mixed with private tenure.

We welcome and can confirm the applicants present application does meet Nationally Described Space Standards across the affordable units.

There is a high demand in the City for affordable housing for people with disabilities. The 2018 Urban Living SPD recommends that 90 per cent of new build housing meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation M4(3) 'wheelchair user dwellings. Whilst the applicant has not reached the Urban Living SPD recommendations for accessible dwellings, they have met Policy DM4 which requires 2% of new housing with over 50 units to be designed as wheelchair user dwellings. We note that two of the M4(3) units are on the first and second floor, we would like to see confirmation that the pathway to these flats is fully accessible for a wheelchair. This should include automatic doors throughout the pathway from the entrance of the block to the front doors of the M4(3) flats. We would also like these plans to be reviewed by our Accessible Homes Team to confirm that the dwellings will meet a lettable standard to a wheelchair user.

Under the present proposal, one of the 4 proposed M4(3) units is for private sale. Unless the applicant is actively intending to market to someone with adaptable needs, we'd recommend this is amended to become an affordable housing unit where we are confident we would be able to find someone who requires an accessible home.

#### Car Parking

At present it appears that the only parking offered for the affordable housing is for the accessible units. As the site is in a central location and there are a good range of transport options this will minimise some of the need for private parking, however there will still be a requirement for provision beyond those spaces provided for the 'accessible units'. We would expect an approved plan to be provided and to be agreed with the Council, with the inclusion of further parking spaces for the affordable units. We would recommend that 10% of the parking spaces are allocated to the Registered Provider who can either independently or in conjunction with the landowner, devise a fair scheme for their allocation to 'affordable housing' residents. We would wish to see this secured in the S106 Agreement.

#### Approved Housing Provider

The developer is expected to provide affordable homes on site without any public subsidy. The affordable units should be transferred to a Registered Provider who is a member of the Homes West Partnership.

#### Rents & Service Charges

Rents for Social Rented units should be set according to the relevant government formula, further information is here.

The service charge is the amount payable on an affordable housing unit in addition to the rent/mortgage due. It should include all estate management charges, ground rents, services, repairs, regular maintenance items such as cleaning and grounds keeping, and the insurance of the building. Sinking funds may be charged additionally to service charges. Sinking Charges should only be set to recover the replacement costs of items or areas of the building at their expected end of 'life' as part of programmed repairs for the building.

To ensure the relative affordability of units, total service charge costs should not exceed £650 for an affordable unit. This figure is benchmarked to 2018 and can be inflated by CPI annually. The total costs of rent + service charges for all affordable units must not exceed the current Local housing Allowance rates, this may mean that the services charges cannot be raised in certain years.

Early consultation is recommended, as good design can overcome the need for high service charges. Where schemes are facing particular difficulties remaining within the cap, such as, but not limited to, needing additional requirements through the planning process, or delivering a complex site with additional costs, exemptions can be requested via the Strategy and Enabling team to raise the cap level. These will be reviewed on a case-by-case basis and should be requested at the earliest possible date in the development process. Developers/ development management companies must not make profit on service charges and can only charge costs that are reasonable to the services they deliver.

#### Enabling Fee

An Enabling Fee will be payable when each affordable home is substantially completed. These fees are designed to maximise affordable housing delivery in the city by assisting registered providers with support on planning, property and highway issues.

A fee of £570 per affordable home index linked from 1 October 2017 will apply. The fee is paid to the Council on substantial completion of each of the affordable homes and applies to Social Rent, Affordable Rent, Intermediate Rent and other Intermediate affordable housing tenures procured through s106 negotiations and delivered without public subsidy or through re-provision/remodelling, extra care housing and 100% affordable housing schemes.

Helen Chard

#### Land Contamination (BCC)

Date: 24<sup>th</sup> February 2023

The following report has been considered as part of the application: Card Geotechnics Limited (May 2022). Bristol Zoo Gardens, Geotechnical and Geo-environmental Interpretative Report. CGE/16703. Revision 2.

Overall we have no objection to the proposed scheme on the grounds of contaminated land as long as conditions are secured for further site investigation and risk assessment in the event planning permission is granted.

We do have the following comments but these can be addressed with future submissions rather than prior to determination. The report includes both desk study and intrusive investigation.

Desk study comments: A number of tanks were identified with contents unknown, including some bunded tanks on the Guthrie Road side of the site, have the tank uses been established since the initial DS/SI?

No mention is made of historical reports on the site, were any made available to the consultants for review?

Site investigation comments: The investigation is acceptable, the report is honest about the limitations of undertaking an assessment whilst the zoo was still operating and further assessment is recommended (samples taken were limited in number and distribution across the site).

Deviating samples for cyanide were noted in the logs but not discussed within the main text of the report.

Future work: We do suggest any future site investigation could zone the site accordingly to the land uses, especially given the large area of public open spaces, this could assist with materials

Page | 90

management ensuring more sustainable development and enhance the amount of soils suitable for reuse. It is recommended a revised radon risk assessment is undertaken given changes made by UK Radon in Autumn 2022. Given the high risk of unexploded ordnance a compliance condition is recommended to ensure any future intrusive investigation or groundworks comply with the advice.

The following conditions are recommended to be applied to any future consent. These can be worded to allow phased development if required.

#### Intrusive site investigation

A site specific risk assessment and intrusive investigation shall be carried out to assess the nature and extent of any site contamination and whether or not it originates from the site. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The results of this investigation shall be considered along with the reports submitted with the original application. The written report of the findings shall be submitted to an approved in writing by the Local Planning Authority prior to any works (except demolition) in connection with the development, hereby approved, commencing on site. This must be conducted in accordance with the Environment Agency's Land Contamination: risk management and BS 10175:2011 + A2:2017: Investigation of Potentially Contaminated Sites - Code of Practice.

#### Submission of Remediation Scheme

No development shall take place (except demolition) until a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment has been prepared, submitted to and approved in writing by the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

#### Implementation of Approved Remediation Scheme

In the event that contamination is found, no occupation of the development shall take place until the approved remediation scheme has been carried out in accordance with its terms. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report (otherwise known as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced, and be approved in writing by the Local Planning Authority.

#### Reporting of Unexpected Contamination

In the event that contamination is found at any time that had not previously been identified when carrying out the approved development, it must be reported immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the Environment Agency's Land Contamination: risk management guidance and BS 10175:2011 + A2:2017: Investigation of Potentially Contaminated Sites - Code of Practice. Where remediation is necessary a remediation scheme must be prepared which ensures the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of

the remediation scheme works.

Reason (for all conditions) : To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

#### UXO Compliance Condition

The development hereby approved must be implemented in accordance with the mitigation measures outlined in the following report submitted by the applicants with the application: Appendix C, Preliminary and Detailed Unexploded Ordnance Risk Assessment, prepared by Alpha Associates within Card Geotechnics Limited (May 2022). Bristol Zoo Gardens, Geotechnical and Geoenvironmental Interpretative Report. CGE/16703. Revision 2.

Reason: To ensure that development can take place without unacceptable risk to workers and neighbours including any unacceptable major disruption to the wider public on and off site that may arise as a result of evacuation/s associated with the mitigation of UXO

#### Mall Gardens Residents Association

Date: 6<sup>th</sup> January 2023

Comments on behalf of Mall Gardens Residents Association:

- Loss of Heritage - loss of a major public amenity for Bristolians which has enriched the lives of generations for over 150 years. The retention of the area as a public amenity in perpetuity is at risk.
- Scale - large blocks of flats some as high as six stories are entirely out of keeping with the character of the area, which is a key conservation area. They are over intrusive and of poor architectural merit.
- Aesthetics - high density accommodation which threaten the heritage asset of the gardens. More time is needed for the development of ideas and broader thinking on the future of the site (eg Eden Centre, RHS)

#### National Highways

Date: 11<sup>th</sup> July 2022

Referring to the notification of a planning application referenced above, for the redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings, at Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA, notice is hereby given that National Highways' formal recommendation is that we:

- a) offer no objection (see reasons at Annex A);
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence. Where relevant, further information will be provided within Annex A.



Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

Signature: Sally Parish

#### Annex A National Highways recommended No Objections

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England was renamed National Highways in August 2021. Prior to April 2015 the organisation was known as the Highways Agency. National Highways is a government owned company responsible for operating, maintaining and improving the SRN.

#### **Statement of Reasons**

The application seeks full permission for the redevelopment of the Bristol Zoo Gardens site (BZG) to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings, at, Guthrie Road, Bristol. The 4.6ha site is located approximately 5.5km south east of M5 Junction 18/18A, 7.2km south west of M5 Junction 17 and 2km west of M32 Junction 3. The proposals comprise the provision of 201 dwellings on the BZGs site together with a new 477sqm Clifton conservation hub comprising an office, education/meeting space, and a café, together with 120 parking spaces. BZG currently operates 1000-1700 Monday – Sunday across 364 days per year. In addition to the main zoo the site houses an education centre for school/community groups and university courses, and the Clifton Pavilion building which operates as a venue for hire throughout the day and evening. The existing site has provision for 340 cars across the north and west car parks and a further 600 spaces at Ladies Mile temporary car park, although use of Ladies Mile is limited to a specified number of days. It is noted that a separate planning application for the redevelopment of the BZG West Car Park for 62 dwellings was granted planning permission in February 2022, under reference 21/01999/F, which is now subject to judicial review. National Highways was not consulted on this application. The existing BZG site is due to close to visitors in September 2022 with the zoo relocating to the Wild Place Project site approximately 7.2km to the north. There will be an ongoing operational presence at the BZG site until final departure in late 2023 when the redevelopment of the BZG site is proposed to commence. No preapplication discussions have been held with National Highways.

#### **Impact on the Strategic Road Network**

##### **Existing BZG Traffic Generation**

Based on pre COVID19 car park ticket data and visitor numbers from 2019, on peak visitor days up to 980 visitor cars were parked on and off-site over the course of the day in addition to around 81 staff park either in West Car Park or on-street each day. Peak days typically occur in school holidays throughout the year and on weekends. Based on BZG visitor records 513,000 attended in 2019, equating to an average of 1,400 per day and 4,000 on peak days. On an average day BZG generates 113 two-way trips in the AM

peak and 158 two-way trips in the PM peak. It is noted that the BZG site typically generates higher vehicular trips at weekends than weekdays, when events are more frequent.

**Proposed development**

The application proposes 37 houses with a provision of 47 parking spaces and 164 apartments with a provision of 71 parking spaces. The supporting Transport Statement (TA) sets out that parking for the apartments would be allocated to specific residences with future occupiers advised of whether parking was allocated for their use. Bristol City Council has confirmed that residents would not be eligible to apply for onstreet parking permits, which therefore removes the opportunity for overspill parking onto surrounding highways. On this basis 93 apartments are being promoted as ‘car free’. The TA derives the trip generation of the proposed residential development based on the TRICS database using the ‘Private House’ and ‘Private Flat’ categories. The TA calculates the traffic generation of the vehicular hub based on the number of staff to be employed, the size and frequency and educational sessions and historic travel surveys for evening events. It is assumed that visitors to the gardens would be resident in the local area and as such would not attract any additional vehicular trips to the site. Based on the sustainable transport opportunities surrounding the BZG site and the proportion of car free dwellings being proposed the presented trip rates are considered acceptable for this development. The forecast trip generation of the proposed development is show below.

Site Traffic Generation (Two-way trips)			
	Existing BZG (Average)	Proposed Residential (201 dwellings) and hub	Net Change
AM Peak (0800-0900)	113 (81)	70	-43 (-11*)
PM Peak (1700-1800)	158 (126)	63	-95 (-63*)

\*Figure in brackets would occur on days that no meetings/events take place at either the Clifton Pavilion or the Hide buildings during the day or evening in the existing situation, or in the evening at the hub in the proposed scenario.

As shown above the proposal is likely to result in a net reduction in traffic generation over the existing BZG use. The TA has also undertaken an assessment of the cumulative traffic impact of the site including the consented residential development for 62 dwellings on the BZG West Car Park (21/01999/F). The cumulative impact of both developments is forecast to be lower than the existing BZG site, resulting in a reduction of 29 two-way trips in the AM peak hour and 82 trips in the PM peak hour.

On the basis the proposal is forecast to result in a net decrease to the traffic currently generated by the site, National Highways is satisfied the development is unlikely to result in an unacceptable impact on the safe operation of the strategic road network, as defined by NPPF.

**Recommendation**

National Highways has no objections to application 22/02737/F

Natural England 1 of 3

Date: 05 July 2022

Our ref: 396676 Your ref: 22/02737/F

Dear Case Officer

Planning consultation: 22/02737/F

Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings. (Major)

Location: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

Thank you for your consultation on the above dated 14 June 2022 which was received by Natural England on the same date. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### SUMMARY OF NATURAL ENGLAND'S ADVICE FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on:

- Avon Gorge Woodlands SAC
- North Somerset and Mendip Bats SAC

Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation. Without this information, Natural England may need to object to the proposal. Please re-consult Natural England once this information has been obtained. Natural England's further advice on designated sites is set out below. Additional Information required Despite the proximity of the application to European Sites, the consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment. It is Natural England's advice that the proposal is not directly connected with or necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out. Natural England must be consulted on any appropriate assessment your authority may decide to make. Avon Gorge Woodlands SAC Recreational impacts from housing developments in the West of England were recognised in the Joint Spatial Plan Habitats Regulations Assessment and, have been screened in as a likely significant effect in the West of England Spatial Development Strategy (SDS). The need for a strategic solution for recreational pressures on designated sites within the West of England has been strongly indicated through the SDS process so far. In our opinion, the location and scale of this proposal means it could have a likely significant effect on Avon Gorge Woodlands SAC from an increase in recreational pressure. Sufficient information must be provided on this issue to inform a HRA. A HRA must be completed proceeding to appropriate assessment where likely significant effects cannot be screened out. It may be possible to screen out this proposal from further assessment if there is significant provision of onsite green space in excess of the existing Bristol City Council open space standards. It is noted that the BCC open space standards have not been updated for a significant time and are modest in comparison with expected national and regional green infrastructure policy. The National Green Infrastructure Standards have been piloted in the West of England through the development of the Joint Green Infrastructure Strategy and

Page | 95

we would expect this work to follow through into the development of Local Plans and Green Infrastructure Strategies by the West of England Unitary Authorities. Should it not be possible for a likely significant effect on the Avon Gorge Woodlands SAC from recreational pressure to be screened out, appropriate mitigation must be secured. This could include for example financial contributions to the management costs of the Avon Gorge Woodlands SAC. North Somerset and Mendip Bats SAC The application site falls within consultation zone Band B of the North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document (North Somerset Council, 2018). While there is no requirement for development in Bristol to follow the SPD, we strongly recommend that it does where an application site lies within the consultation zone. The consultation zone extends from horseshoe roosts in close proximity to Avon Gorge Woodlands SAC which are considered to be functionally linked to the North Somerset and Mendip Bats SAC. The consultation zone indicates the potential importance of habitats on site to horseshoe bats associated with the SAC. For sites within Band B of the consultation zone, a full season of bat surveys are generally required unless minor impacts can be demonstrated. Due to the presence of moderate quality foraging habitat within the application site (as noted in the Ecological Appraisal (The Landmark Practice, May 2022)) Natural England advise that a full season of surveys should be undertaken to assess the importance of this site to the SAC. Results of bat surveys from August to October 2021 have been presented in the Ecology Appraisal. It is understood that further surveys have been undertaken between April to June 2022 however, the results of these surveys are not currently presented. The results of these surveys are required for Natural England determine the impact of the proposal on the North Somerset and Mendip Bats SAC. Please re-consult Natural England once this information has been obtained. The survey results presented so far show that only one lesser horseshoe bat call was recorded on site and no horseshoe roosts are present. Should the survey results from April to June show a similar pattern of horseshoe bat activity then we consider it unlikely that this proposal will result in a Page 3 of 3 significant impact on the SAC through the removal of suitable habitat within the site. To the north of the application site is the Clifton Downs which form suitable habitat for horseshoe bats associated with the SAC. The application must therefore demonstrate that it will not result in increased light levels on this habitat. Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence. Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service. Please consult us again once the information requested above, has been provided.

Yours sincerely Amelia Earley Wessex Team

## Natural England 2 of 3

Date: 31st January 2023

Thank you for consulting Natural England on the above application. Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority. Avon Gorge Woodlands SAC The Shadow HRA screens in a likely significant effect to the Avon Gorge Woodlands SAC due to dust generated from construction vehicles moving to and from the application site on roads within 50m of the SAC. We concur that the mitigation measures in Section 12 of the Shadow HRA will be sufficient for construction vehicle dust to not result in an adverse effect on the integrity of the SAC. Regarding recreational pressures on the Avon Gorge Woodlands SAC, Natural England have advised Bristol City Council in our recent response to their draft

Page | 96

local plan that recreational pressures at the SAC must be assessed and is likely to result in a Likely Significant Effect on the SAC. This is consistent with the conclusions of the HRA Scoping Report produced for the WECA Spatial Development Strategy. We consider that the proposals include mitigation to ensure that the proposal will not result in an increase in recreational pressure on the SAC, the proposals provide onsite greenspace which exceeds BCC's open space quantity standards. Other Designated Sites Natural England concur with the conclusions of the Shadow HRA regarding the North Somerset and Mendip Bats SAC and the Severn Estuary SPA/SAC/Ramsar. Kind regards, Amelia Planning Lead Advisor Wessex Team

### Natural England 3 of 3

Date: 8<sup>th</sup> March 2023

Hi Case Officer,

Thank you.

You are correct, our advice is that when considered both alone and in combination with other development we do not consider that the proposed development would result in an adverse effect on the integrity of the SAC. Our comments regarding contributions to greenspace management were made in reference to increased pressure on greenspaces in the vicinity of the development generally rather than specifically about the Avon Gorge and Woodlands SAC.

Kind regards,

Amelia

Amelia Earley (she/her) Planning Lead Advisor Wessex Team

### Nature Conservation (BCC)

Date: 2<sup>nd</sup> March 2023

Nature Conservation Comments - 22/02737/F - Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA, March 2023

The Bristol Zoo Gardens Site is located in a semi-urban area adjacent to the Clifton and Durdham Downs Site of Nature Conservation interest (SNCI), though is not considered this proposed development will have a direct impact to this site. The site is not within a wildlife corridor (part of the Bristol Wildlife Network).

The Ecological Appraisal (EA) (The Landmark Practice, October 2022) sufficiently addresses the ecological features of the site by providing the results of extensive surveys, and outlines appropriate protection, enhancement, and mitigation measures required for this proposed development.

The proposed scheme will likely disturb, damage or destroy up to 14-day bat roosts. All roosts identified are summer day roosts used by common species in low numbers. In order to proceed with the proposed development legally, a licence from Natural England will be required. An outline mitigation strategy and method statement (MSMS) has been included in the EA by The Landmark Practice (TLP). Conditions below regarding works affecting bats and/or their roosts do not conflict with the outline MSMS. The proposal would not be detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range. Justification has been provided by the applicant to demonstrate how the three tests required to be met by the Local Planning Authority to comply with the legal protection afforded to European protected species (in this case bats) are considered to be met, and it is anticipated that a license from Natural England will be

Page | 97

granted. The license application will conclude how the three tests are met in detail. This is for the planning officer to make final judgement.

The submitted Biodiversity Net Gain Report (BNGR) (The Landmark Practice, October 2022) shows that a 39.86% gain in habitat units and 376.35% gain in hedgerow units will be achieved through the proposed landscaping scheme (11585-LD-PLN-300 REV B, Land Use Consultants). The proposed urban trees within the BNG metric represent half of the proposed urban trees on site, assuming that only half of all proposed trees will reach full maturity to factor in the various risks to the longevity of trees within the site, including those within private gardens. For transparency Bristol City Council (BCC) and (TLP) agreed that the BNG metric was re-run, removing retained and proposed trees in private gardens as their maintenance to desired condition cannot be guaranteed for 30-years (as required by the Environment Act 2021, schedule 7A, Part 1, paragraph 9). TLP provided re-run BNG calculations removing these trees which resulted in a drop from 39.86% to 36% gain in habitat units. BCC accepts the cautionary approach to inputting urban tree habitat into the BNG metric and acknowledges the minor reduction in the BNG calculation.

The Habitat Regulations (Screening and Appropriate Assessment)

TLP provided a shadow Habitats Regulations Assessment (HRA) in October 2022, and an updated HRA in February 2023 which considered the likely significant effects (LSE) of the proposed development on National Site Network Sites within 10 kilometres (stage one screening) and Appropriate Assessment (AA). The updated HRA contained a site in the incombination assessment which had previously not been included. The shadow HRA concluded that no LSE are anticipated via noise, visual or hydrological/drainage to the Severn Estuary European Marine Sites, and no LSE are anticipated on the qualifying features of the North Somerset and Mendip Bats Special Area of Conservation (SAC). In the absence of mitigation, the proposed development has the potential to result in LSE upon the Avon Gorge Woodlands SAC as a result of potential air quality impacts from increased dust generated from the movement of lorries to and from the proposed development site, known as “track-out routes” during the construction phase. The Air Quality Assessment produced for this proposed development (Hydrock Consultants Limited, 2022) concludes that: “Overall, the Proposed Development is considered to be Medium Risk for nuisance dust soiling effects, Low Risk for PM10 health effects and to be Medium Risk for ecological impacts, in the absence of mitigation.”

The AA considers whether a plan or project could result in an Adverse Effect on Integrity (AEoI) of one or more National Site Network sites, either alone or in combination with other projects. Mitigation measures to reduce the risk of impacts to the Avon Gorge SAC during construction are outlined in appendix A of the Air Quality Assessment (Hydrock Consultants Limited, 2022) and are recommended to be conditioned within a Construction Environmental Management Plan below. With the specified mitigation in place to protect the Avon Gorge SAC, there would be no anticipated AEoI on a National Site Network site within 10 kilometres of the proposed development and the AA concludes that there is unlikely to be an AEoI to the Avon Gorge Woodlands SAC from in-combination effects between the proposed development and three other large-scale proposed developments in the surrounding area. Natural England provided feedback on the shadow HRA dated October 2022, which states that: “We consider that the proposals include mitigation to ensure that the proposal will not result in an increase in recreational pressure on the SAC, the proposals provide onsite

greenspace which exceeds BCC's open space quantity standards." BCC has not received feedback from Natural England on the updated HRA (February 2023) as of March 2023, but understand comments are expected soon.

The conclusions of the shadow HRA/AA (2023) are supported and the HRA/AA is adopted by BCC as competent authority.

If this application is deemed to be approved, the following conditions apply.

#### Method statement: Avon Gorge Exhibit translocation

Prior to the commencement of the proposed development, a species list and method statement for the translocation of the Avon Gorge Exhibit to another location within the site shall be provided to Bristol City Council for approval in writing.

Additionally, the Landscape General Arrangement (Roofscape) West (1 of 4) drawing (no. 11585-LD-PLN-111, Land Use Consultants) must be updated to reflect that the Avon Gorge Exhibit is being translocated to the new Avon Gorge and Downs Conservation hub. This updated plan should be provided to discharge this condition.

Reason: To safeguard rare species endemic to the Avon Gorge.

#### 30-year Landscape and Ecological Management Plan

The applicant shall submit a 30-year Landscape and Ecological Management Plan (LEMP) for all retained, enhanced, relocated and created habitats on site for approval in writing by Bristol City Council. The LEMP should set out management compartments, objectives, and prescriptions in order for all retained, enhanced, relocated and created habitats on site to reach their target condition, and 36% gain in habitat units and 376.35% gain in hedgerow units to be achieved as shown in the BNGR (The Landmark Practice, October 2022) for this application. It should also show how management of the site will be resourced and monitored. The LEMP shall be reported to the LPA once every 5 years.

Reason: Ecological enhancement is needed to meet the requirements of the revised National Planning Policy Framework (NPPF, 2021). The NPPF states in paragraph 174 (d) on page 50 that "Planning policies and decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity..." and the Environment Act (2021) requires habitats to be maintained for 30 years after development is completed (schedule 7A, Part 1, paragraph 9) to secure longterm net gains for biodiversity.

#### Construction Environmental Management Plan

Prior to commencement of the proposed development, the applicant shall submit a standalone Construction Environmental Management Plan (CEMP) for approval by Bristol City Council. This shall include measures to comply in full with the recommendations made in the Ecological Impact Assessment (The Landmark Practice, October 2022) and the Shadow HRA (The Landmark Practice, October 2022) i.e to avoid offences against legally protected and priority species and habitats during construction (including site clearance, pollution prevention, demolition, vehicular movements and lighting impacts), and to avoid any impact on the Avon Gorge Woodlands SAC. Provision shall be made within the CEMP for the appointment of an Ecological Clerk of Works (ECoW) to undertake site visits, supervise ecologically sensitive operations and ensure the mitigation measures outlined in the shadow HRA are implemented to protect the Avon Gorge SAC.

The mitigation measures required during construction to protect the Avon Gorge SAC outlined in the Air Quality Assessment (Hydrock Consultants Limited, 2022) via the Shadow HRA (The Landmark Practice, October 2022) are as follows:

- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.
- Avoid dry sweeping of large areas.
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
- Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.
- Record all inspections of haul routes and any subsequent action in a site logbook.
- Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior leaving the site where reasonably practicable).
- Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.

These mitigation measures must be included in the CEMP and implemented during construction.

Where considered to be required by the project ecologist, the CEMP shall be supplemented by a Method Statement for a Preliminary Method of Working (MS-PMW) to avoid accidental harm being caused to any protected, priority or notable habitats or species.

The proposed development shall be carried out in full accordance with the approved details or any amendments agreed in writing by Bristol City Council.

Reason: To demonstrate compliance with: the 1981 Wildlife & Countryside Act (as amended); the 1996 Wild Mammals Protection Act; the 2017 Habitats Regulations; the 2006 NERC Act; the 2006 Animal Welfare Act; and the 1992 Protection of Badgers Act.

#### Precautionary Method of Working (PMW)

Prior to commencement of the proposed development, a method statement for a Precautionary Method of Working (PMW) shall be prepared by a suitably qualified ecological consultant and submitted to and approved in writing by the Local Planning Authority. The PMW shall include measures to consider/protect the following species and their habitats:

- a. Amphibians
- b. Bats\*
- c. Invasive species
- d. Slow worm
- e. Nesting birds
- f. Invertebrates
- g. Badgers,
- h. Hedgehogs\*\*

with respect to vegetation/ site clearance, and construction activities.



The proposed development shall be carried out in full accordance with the approved method statement.

\*As specified in the EA (TLP, October 2022) prior to demolition and following the relocation of the animals, the two timber sheds (which housed the Squirrel Monkeys) should be reinspected, with demolition undertaken in a sensitive manner under ECoW by a bat licenced ecologist.

\*\* Hedgehog is a Priority Species in the Bristol Biodiversity Action Plan

Reason: To ensure the protection of legally protected and priority (Section 41) species which are a material planning consideration. And to demonstrate compliance with the 1981 Wildlife & Countryside Act (as amended) and the 2017 Habitats Regulations.

Guidance: According to paragraph 180 (page 52) of the National Planning Policy Framework (2019), 'Planning policies and decisions should... limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'

#### Bat Mitigation Method Statement

Prior to commencement of the proposed development, a bat mitigation method statement in accordance with outline mitigation strategy and method statement included within the approved Ecological Appraisal (ref. 3442, October 2022) shall be submitted to Bristol City Council for approval in writing. The method statement shall include the following:

- A plan and/or photographic evidence showing bat boxes erected pre-commencement of works for enhancement of the existing potential roosting features on site (prior to bat controlled exclusion from existing roosts, if this is required)
- The products used in place of Breathable Roofing Membranes (BRMs) (known to be harmful to bats as they can become entangled in the fibres)
- Method statement for moving bat box confirmed roosts that are proposed to be resited
- Bat Controlled exclusion method statement (if a controlled exclusion is required)
- Protection of commuting and foraging habitat to be retained

Reason: To provide an overlap in roosting habitat (lost and created) in order to prevent loss of roosting habitats for bats, and to ensure the protection of legally protected and priority (Section 41) species which are a material planning consideration. And to demonstrate compliance with the 1981 Wildlife & Countryside Act (as amended) and the 2017 Habitats Regulations.

#### Ecological Mitigation and Enhancement Strategy (EMES)

Prior to the commencement of the proposed development the applicant shall submit an Ecological Mitigation and Enhancement Strategy (EMES). This shall include details of the mitigation provided for:

- a. Amphibians and reptiles (the creation of 3no. hibernacula adjacent to the new lake and in the dense planting around the Monkey Temple)
- b. Bats (1. To mitigate for roost-loss, 20no. bat boxes installed in pairs on mature trees throughout the site and 20no. integrated into new and retained buildings prior to works commencing. 2. For enhancement, 10no. installed in pairs on mature trees throughout the site, and 10no integrated into new and retained buildings)
- c. Nesting birds (1. 30no. bird boxes integrated into the fabric of the new buildings and on mature trees throughout the site to include 6no terrace nest boxes suitable for house sparrow and 12no. suitable for swift, to be placed in three groups of four. 2. 31no existing bird boxes re-sited within retained habitat on site)

d. Invertebrates (bricks and boxes integrated in to new buildings)

e. Hedgehogs\* (boxes and permeability measures);

The location, specification, height and orientation of these features shall be shown on a site plan.

The proposed development shall be carried out in full accordance with the approved details or any amendments agreed in writing by Bristol City Council.

Reason: (1) The Natural Environment and Rural Communities (NERC) Act 2006 (Section 40) obliges the LPA ‘... in exercising its functions, [to] have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’. In order to discharge its biodiversity duty, the LPA must satisfy itself that all developments deliver ecological enhancement wherever reasonably possible; (2) Ecological enhancement is a requirement of the revised National Planning Policy Framework (2021) which states (in paragraph 174) that ‘Planning policies and decisions should contribute to and enhance the natural and local environment...’.

\* Hedgehog is a Priority Species in the Bristol Biodiversity Action Plan

Method Statement: Living Roofs

Prior to commencement of the proposed development the applicant shall submit a method statement prepared by a suitably qualified ecological consultant or landscape architect to be approved in writing by Bristol City Council for the creation of green and brown roofs. This shall include:

- details of the seed mix proposed (to not include large areas of sedum)
- features for invertebrates e.g stone and log piles, areas of bare ground and rope coils,
- depths of substrate
- construction method
- and a maintenance plan e.g watering/care schedule and details of the provision of new plants should the originals fail

All details shall be shown on a scale plan of the site.

The proposed development shall be carried out in full accordance with the details submitted or any amendments approved in writing by the Council.

Reason: To conform with Policy DM29 in the Site Allocations and Development Management Policies Local Plan, which states that: ‘Proposals for new buildings will be expected to incorporate opportunities for green infrastructure such as green roofs, green walls and green decks’.

Vegetation Clearance

All species of wild birds, their eggs, nests and chicks are legally protected until the young have fledged. No clearance of vegetation or structures suitable for nesting birds shall take place whilst birds are nesting, which is typically between 1st March and 31st August inclusive in any year without the prior written approval of the Local Planning Authority. If works are proposed within this period, the Authority will require evidence provided by a suitably qualified ecologist that no breeding birds would be adversely affected including by disturbance before giving any approval under this condition. Where checks for nesting birds are required, they shall be undertaken by a qualified ecological consultant no more than 48 hours prior to the removal of vegetation or the demolition of/works to buildings.

Reason: To ensure that wild birds, building or using their nests are protected, to

demonstrate compliance with the 1981 Wildlife & Countryside Act (as amended).

#### Lighting Plan

Prior to the commencement of the proposed development, details for any proposed external lighting shall be submitted to and agreed in writing by the Local Planning Authority. The proposed development shall be undertaken in accordance with the approved details. This shall include a lux level contour plan of the site pre-development and post-development. The lux contour plan shall show lux levels at frequent intervals (lux levels at 0, 0.2, 0.5, 1, 1.5, 2, 3, 4, 5 lux and higher are particularly useful) and extend outwards to additional levels (above the pre-existing background light level) of zero lux. The lux contour levels shall be superimposed on a site plan which includes all land that is affected by raised light levels (including potentially land outside the red line planning application area) and shall reflect the use of any proposed mitigation, e.g visors.

Advice note: The lighting design should be in accordance with BCT & ILP Guidance Note 08/18 'Bats and Artificial Lighting in the UK'

<https://cdn.bats.org.uk/uploads/pdf/Resources/ilp-guidance-note-8-bats-and-artifici>. Where external lighting is required, it should be motion triggered by passive Infrared sensors (where safety and security allows) and mounted on the horizontal with no upward tilt, away from retained features.

Guidance: According to paragraph 180 (page 52) of the National Planning Policy Framework (2019), 'Planning policies and decisions should... limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'

Reason: To conserve legally protected bats and other nocturnal wildlife complying with the 1981 Wildlife & Countryside Act (as amended).

#### Ecology Report

If the proposed development has not commenced within 18 months of permission granted, an updated ecological survey shall be carried out by a suitably qualified ecological consultant and shall be submitted to and approved in writing by the Local Planning Authority. The survey shall conclude whether the EMES, PMW or Bat Mitigation Method Statement should be updated, and if so, these shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any works.

The proposed development shall then be undertaken in full accordance with the approved Ecology report/EMES/PMW/Mitigation Method Statement.

Reason: To ensure legal and policy compliance with regard to valued ecological species and habitats as well as to invasive plant species.

#### Advice Note: Bats

A grant of planning permission does not remove the legal protection afforded to bats and their roosts. If, during any work not granted a European Protected Species License (EPSL) any bats (or signs of bats, such as droppings) are found, an immediate halt should be called and a bat worker/ecologist should be consulted to determine if and how the works can proceed lawfully, with or without a mitigation licence.

The bat activity, building and tree surveys (conducted by The Landmark Practice, 2022), are valid for 18 months only. If the works have not commenced within 18 months of the survey

date, then the survey should be repeated and the results submitted to Bristol City Council for written approval, prior to commencement.

Should the survey result in the need for mitigation measures, then these must be approved in writing by the Local Planning Authority and implemented in full prior to the commencement of the proposed development.

### Northcote Road Residents Association 1 of 3

Date: 20<sup>th</sup> March 2023

Dear Case Officer

Re: Planning Application Reference 22/02737/F at Bristol Zoo Gardens, Bristol, BS8 3HA – Response Letter Anstey Horne have been asked to review the additional information published in the planning portal following our letter dated 19 December 2022. These include Response to Case Officer's Note published on 13 January 2023, as well as Daylight Distribution Contours, Two Hours Sun on Ground Study and summary email produced by Delva Patman Redler and published on the planning portal on 3 February 2023.

Regarding the DPR's response to Anstey Horne letter, we would like to bring your attention to the following

inaccuracy in Response to Case Officer's Note where DPR state:

"When considering the daylight implications in this situation it is important to note that the retained VSC levels to 78 (93%) of the 84 windows are at above 20% which is considered acceptable and shows that the rooms will remain with the potential to receive good levels of daylight. Of the 6 windows that do not retain 20% VSC, 4 are believed to serve entrance ways which are not habitable rooms and have been included for completeness."

[emphasis added]

The above statement is incorrect, as of 84 windows considered, only 62 windows (73.8%) will have retained

VSC value of more than 20%. Moreover, when assessed against the BRE guidelines, 60 (71.4%) will fully comply

with the VSC targets (min retained value of 27% VSC or max 20% reduction if below), leaving 24 that will experience an adverse effect as a result of the development.

This inaccuracy skews the overall picture. Moreover, while in some circumstances, residual VSC values of 20%

can be considered acceptable, it is at the local authority's discretion to accept this argument or not for this specific area.

We noted that more recently, DPR updated their report to incorporate our site notes and provided an updated

summary of results (published on 3 February 2023). Once non-habitable rooms and windows were removed,

the updated results show that 50 (76%) out of 60 windows tested and 29 (91%) of 32 rooms will comply with

2

the BRE guidelines. Where DPR point to some improvements in performance, this is down to discounting a

number of windows in non-habitable rooms and not to a lesser impact of the proposals on the properties. Moreover, once the layout was updated, the results showed more material impact in daylight distribution terms.

Furthermore, the DPR emphasise the benefit from the gap between the proposed blocks as below:

Page | 104

"...5 Northcote Road is located opposite the gap between the blocks meaning that light will continue to penetrate deep into the room. "

and

"Furthermore, the scheme has been designed to incorporate a gap directly opposite these buildings ensuring

that these properties generally remain with good levels of daylight. "

Again, DPR seem to disregard the fact that the gap is currently occupied by 14m high mature tree of a spread

between 6 to 8m. Based on the Arboricultural Report (prepared by WTC and dated 24 May 2022) and the proposed landscape plan, it is clear that the tree (T119 Lawson Cypress) is evergreen and will be retained.

Therefore, it is misleading to state that the gap was incorporated in the design to allow for access of light to

Northcote Road properties, given the tree is intended to stay and will limit the access of light through the gap

between the proposed blocks.

The size and scale of the subject tree are illustrated in the street image below taken from Google.

3

Below is the extract from the DPR report on which we marked in red the position of tree T119 and based on

the survey data, T119 reaches a level similar to the average level of the proposed blocks (around 82m AOD).

We note that Bristol City Council have previously raised some concerns in relation to the impact of trees on

the development site itself and requested an additional assessment. Therefore, it is clear that the possible impact of trees is recognised by the local authority.

The DPR study does not take into consideration any effect of trees on the development site, which intend to

remain and are part of the design for the site. We see this approach common as an initial assessment.

We appreciate that the effect of trees can be difficult to assess in some cases and the BRE guide states:

"It is generally more difficult to calculate the effects of trees on daylight because of their irregular shapes and

because some light will generally penetrate through the tree crown. Where the effect of a new building on

existing buildings nearby is being analysed, it is usual to ignore the effect of existing trees. This is because daylight is at its scarcest and most valuable in winter when most trees will not be in leaf."

The BRE guidelines is more specific when it comes to the impact of the existing trees on the new proposed

units and outlines ways of calculating the impact of trees.

"Sometimes, however, trees should be taken into account, for example where a new dwelling is proposed near

to large existing trees. There may be concern that future occupants of the dwelling may want the trees to be

cut down if they block too much skylight or sunlight."

4

The guidelines also explain the difference between the changing shade of a deciduous tree and the more solid

and constant shade of evergreens.

Overall, it is clear that trees can reduce daylight and sunlight accessing the property, especially if evergreen trees are considered. Therefore we ask the local authority to consider this fact in their decision. While the BRE guidelines provide detailed advice on assessing trees and proposed buildings and limited information on the existing buildings, we feel it is inappropriate to ignore the impact of a subject large evergreen tree on light within the Northcote Road properties. Moreover, pointing towards incorporating the gap between the blocks as a way to preserve access of light and ignoring the fact that a significant mature evergreen tree occupies the gap is misleading. Please note that the subject tree sits within the development site and it does form a part of the proposal for the site. Should the assessment be carried out with the relevant trees in place, it is reasonable to assume that it will show more realistic results where areas of Northcote Road properties are impacted to a higher degree due to lower baseline figures than currently reported. Selective and unrepresentative arguments can skew the overall picture, therefore we ask the local authority to consider the content of our letter alongside other evidence produced by our client in considering the acceptability of the scheme.

Yours sincerely,  
Anstey Horne

### Northcote Road Residents Association 2 of 3

Date: 19<sup>th</sup> December 2022

Dear Case Officer

Re: Planning Application Reference 22/02737/F at Bristol Zoo Gardens, Bristol, BS8 3HA – Objection to adverse impacts on 1 to 6 Northcote Road

Anstey Horne have been appointed by Northcote Road Residents Association to prepare an objection letter in

regard to adverse impacts the proposed scheme at Bristol Zoo is expected to have on 1 to 6 Northcote Road.

To familiarise ourselves with the relevant context, we visited the site on 8 December 2022. We gained access

to numerous apartments at 1 to 6 Northcote Road, recorded a sample of measurements and took photos to

understand the layout of the properties.

We have also reviewed the documents published on the planning portal under the application number 22/02737/F, paying special attention to the following reports:

- Daylight and Sunlight Report – Delva Patman Redler – 8 April 2022
- Daylight and Sunlight Addendum Report – Delva Patman Redler – 18 October 2022
- Overshadowing Report - Delva Patman Redler – 18 October 2022

While the Overshadowing Report relates to the development site itself, two other documents relate to the

impact of the proposed scheme on the neighbouring residential amenity. We cross-referenced the Daylight

Page | 106

and Sunlight reports with our observations made during the site visit and we raised the following issues:

### 1. Methodology

- In June 2022 the BRE Report 209, 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' was updated to the third version 2022. We note, however, that while the methodology for the internal assessment of the proposed light levels diametrically changed, the previous tests for the neighbouring properties remained in place.

2

- Categorisation of magnitudes of impact and significance of effects (s.5 of DPR's report 8 April 2022) – We note that the BRE guide in Appendix H allows the guidelines to be utilised for environmental impact assessment (EIA); however, using EIA criteria to describe daylight and sunlight impact outside EIA documents is unusual.

- Flexible application of the guidelines and alternative target values (s.6 of DPR's report 8 April 2022) – We note the DPR's report lists some examples that are considered to be of relevance, for example appeal ref: APP/E5900/W/17/3191757 and appeal ref: APP/E5900/W/17/3171437. Please note that they relate to high-density urban areas in London, which do not resemble the Bristol Zoo development site. We appreciate the general methodology, however it is important to emphasise that this is only relevant for the specific contextual location and in our opinion, not applicable to the subject site. The lack of clarity may lead to misinterpretation of impacts by the reader.

### 2. Study

- Layout utilised in the assessment

We note that DPR have not located internal layouts for 1 to 6 Northcote Road despite numerous information available online. While these are not all up to date online, they could have helped better inform the understanding the building layout and impact the results. DPR's report states that where they have not found plans online, they utilised a notional 4m deep layout in their assessment. This is not unreasonable where no relevant information is available online.

However, DPR chose not to present their No Sky Line (or Daylight Distribution) results on the contour drawings. Therefore, the interested parties could not comment either on the internal arrangement utilised in their assessment or on the actual loss of sky visibility within their rooms.

We request the daylight distribution contour drawings are included within the revised report for transparency. We would then request a period of further consultation so our client may consider further representation.

Please note that we have visited the ground, first and the second floor at 6 Northcote Road, the lower ground floor at 5 Northcote Road and all floors at 1 and 2 Northcote Road. We have also received additional information in regard to the lower ground floor at 6 Northcote Road.

Based on our findings during the site visit, we can confirm that numerous rooms in the most crucial areas on the lower ground and ground floors are around 5.2m deep. The room depth is crucial to understand the impact on the sky visibility, which is discussed in more detail below.

### 3. Results

We have not had access to the 3D analysis model utilised in DPR's assessment to comment on the accuracy and we assume that it has been correctly compiled using the source information described in the body of their report.

3

To assess the daylight and sunlight within 1 to 6 Northcote Road, DPR utilised Vertical Sky Component (VSC), Daylight Distribution (DD/NSL) and Annual Probable Sunlight Hours (APSH) and we agree with these tests. However, we find some results questionable and we request further clarification.

As mentioned above, we visited a number of properties and below we present details of the internal arrangement of some crucial lower ground floor areas and corresponding results.

- 6 Northcote Road – lower ground floor - bedroom – no access, layout based on the floor plans – 4.75m

deep, 4m wide

The above bedroom is indicated in DPR's report as B01 - R1 served by windows W2 and W3. The results note VSC reduction marginally beyond the BRE suggestion to W2 and NSL reduction from 100% to 90% (1.26m<sup>2</sup>) which is considered within the BRE allowance. However, we understand this was achieved based on the notional depth of the room of 4m. Given the percentage loss of light to the actual area of sky visibility lost, it is understood that the area of the tested room was 12.6m<sup>2</sup>, which is, in fact, around 18.5m<sup>2</sup>.

Should our assumptions be correct, the percentage loss of NSL is likely to fall beyond the BRE allowance of 20%. Given the actual area of the room, the residual NSL value is expected to be around 65%-75%, however to comment on this further, we would need to understand the layout utilised in DPR report. Normally, the layout used in the assessment can be identified from the daylight distribution (DD/NSL) drawings, however these were not included in the DPR's report and we request them to be submitted as a part of the amended report.

4

- 5 Northcote Road – lower ground floor - kitchen/dining room 5.2m deep, 3.4m wide

The above kitchen/dining room is indicated in DPR's report as B01 - R1 served by windows W1 and W2. The results note full compliance in VSC and NSL terms. Moreover, the NSL results show room receives sky visibility to 99% in the current condition and less than 1% change post-development. It must be noted that W2 from DPR's report serves an adjacent bathroom and the above room is only served by one main window and small glazing above the entrance door. In the current condition, the sky is only visible from the front of the room and it is unlikely that the result would show values near 99% when the actual layout is assessed. Moreover, light is precious in this main habitable room and any loss of light would impact the enjoyment and use of this home.

We appreciate that DPR have not had access to our client's property and used reasonable notional layouts at the time of the test. However, the daylight distribution contour drawings were not included in the report, therefore the discrepancies and how they may affect the results were not addressed. Therefore, we request this be included in the updated report for clarity and further comments and APSH tested for the main window in this room which is W1.

5

- 2 Northcote Road – lower ground floor – living/dining room – 5.2m (to the bay window) deep, 4.7m wide

The above living/dining room is indicated in DPR's report as B01 - R1 served by windows W1, W2 and W3. The results note VSC reduction beyond the BRE suggested target values to all three windows. Moreover, the study notes a reduction of NSL from 99% to 79% (equivalent to 4.69m<sup>2</sup> of loss) which is borderline.

Similar to the above we assumed that the layout utilised was notional 4m deep. Again, we cannot confirm this without seeing the results on the contour drawings.

Should our assumptions be correct, the percentage loss of NSL is likely to fall beyond the BRE allowance of 20%. During the site visit we did not observe sky being available in the rear part of the room and it was clear that any material loss of light would impact the use and enjoyment of this room which the losses on the floor above further worsening the enjoyment of this home.

Additionally, we request that the overshadowing assessment to the front garden is provided. The garden indicated on the image below, is the main garden of the property and we request this is added to the report.

6

- 1 Northcote Road – lower ground floor – living room – 5.2m (to the bay window) deep, 4.7m wide

The above living room is indicated in DPR's report as B01 - R1 served by windows W1, W2 and W3. The results note VSC reduction beyond the BRE suggested target values to all three windows.



7

Moreover, the study notes a reduction of NSL from 99% to 71% (equivalent to 6.45m<sup>2</sup> of loss) which is also beyond the BRE allowance of 20%.

We assumed that the layout utilised was notional 4m deep and again, we cannot confirm this without seeing the results on the contour drawings.

Should our assumptions be correct, the percentage loss of NSL is likely to fall beyond the BRE allowance of 20% further and impact the room significantly. Moreover, losses beyond the guidelines on the ground, first and second floor are also present. It needs to be noted that the depth of the rooms on the first and second floor are around 5.2m with the second-floor bedroom being 4.2m deep and it is likely that the actual impact is more severe than reported. Therefore, we request the daylight distribution contour drawings illustrating the layout utilised for the assessment are added to the report.

Similarly to 2 Northcote Road, we request that the overshadowing assessment to the front garden is provided. The garden indicated on the image below, is the main garden of the property and we request this is added to the report.

8

### Summary

We have visited the site to familiarise ourselves with the properties at 1 to 6 Northcote Road and their current relationship with the development site. We have also reviewed the DPR'S Daylight and Sunlight reports available under planning application 22/02737/F.

We noted that the report records mainly minor adverse impacts of the properties at 1 to 6 Northcote Road. We understand that DPR utilised a measured survey to position neighbouring windows, therefore, we have no reason to question the correctness of VSC results. The VSC method is a simplistic initial tool for establishing light potential and it is recommended it is considered alongside the DD (NSL) method. The latter is, however highly dependent on the accurate room layout and we do not believe the notional 4m room depth, as understood to be used in DPR's report, represents the actual situation accurately.

We cannot be certain what was utilised in the assessment as DPR did not include the DD contour plots within their report. Therefore, it is essential this is supplied for clarity and further comments. During the site visit, we confirmed that most of the relevant rooms are around 5m deep and it is likely they will suffer a larger than the reported reduction of light.

Furthermore, the DPR report did not include the overshadowing assessment to the main garden amenities at 1 and 2 Northcote Road which are located at the front of the properties. We request this to be provided and we would appreciate if the sun on ground assessment was accompanied by transient overshadowing, which would provide a visual representation of the changes in the shadow cast by the proposed scheme on the neighbouring amenity during the course of the day.

Our client understands the need to provide housing and is merely asking for the proposed scheme to be respectful of their properties. They urge the Applicant to consider amendments to the scheme which will maintain adequate levels of natural light to their properties. They also would like the Applicant to be aware that they are prepared to assert their rights of light through legal means if such a need arises. To avoid that, they would welcome any necessary amendments to the scheme as early as possible.

Concluding, we are of the opinion that the information provided by the Applicant is not complete at this stage and the Council is advised to request the additional information listed above to be provided to have the full picture of the actual impact on the neighbouring properties before determining the application. Upon submission of the additional elements, we would welcome a period of consultation which would allow us to comment on the amended report if needed.

Yours sincerely,

Page | 109

Anstey Horne

### Northcote Road Residents Association 3 of 3

Date: 6<sup>th</sup> February 2023

Dear Sir/Madam

Planning Application Ref 22/02737/F

Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA

#### Introduction

We write on behalf of the Northcote Road Residents' Association, to raise objection to the above application seeking full planning permission for redevelopment of the site to include 196 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2) and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selection demolition of buildings.

As will be apparent from the numerous individual letters of objection already submitted, local residents have numerous concerns about this proposal.

#### Section A : Unnecessary and Insufficiently Mitigated Harm to Heritage Assets and the Clifton Conservation area

1. These concerns start with the loss of an established, nationally recognised zoological facility and its gardens, a concern which is shared by the Council's Conservation Advisory Panel.
2. The Panel was concerned that no evidence has been provided to indicate that the closure of the site, and its change of use, is economically necessary. Neither have alternative uses been actively considered that might better preserve the significance of a nationally important heritage asset.
3. The approach to be taken in such cases is set out in the National Planning Policy Framework. Account must always be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
4. Where, as here, a development would lead to substantial harm or total loss of significance of a designated heritage asset, consent should be refused unless it can be demonstrated that this harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss except in very specific circumstances.
5. These include where the nature of the heritage asset prevents all reasonable uses of the site, a key consideration in relation to which the applicant has provided no evidence. Alternatively, approval may be justified where no viable use of the heritage asset can be found. Here again, however, no substantive evidence has been forthcoming.
6. Whilst we acknowledge that the proposal is not without merit in terms of providing residential and community facilities, there is nothing to indicate that the need for such facilities could not be met in other ways, either in a more appropriate scale, form and design on this site, or elsewhere on other sites. The unexpected availability of this additional space resulting from Covid that is being proposed for

housing development does not mean this proposed level of extra housing development is necessary nor significant compared with the demands of the Core Strategy:

i) Bristol City Council states in its November 2022 Local Plan Review (Appendix 1) that its Core Strategy requirement for 2026 is “likely to be exceeded by around 4000 homes and that it has a strong supply of planning permissions at present which are expected to enable the delivery of 2000 homes a year in the first (next) 5 years”.

ii) Clifton is not one of the key areas defined and targeted for essential housing development in Bristol’s Site Allocation and Development Management Policies.

iii) Although the 20% affordable housing level proposed is deemed acceptable it is low (40 units) and below the preferred percentage - even if construction were likely to begin at the earlier time required after planning permission was granted. This is far from certain given the site’s complexities. More importantly, this proposed development will have a negligible impact on the key stated core requirement for affordable housing. The November 2022 Local Plan Review states “There is expected to be a significant need for affordable homes ...this means homes to rent or buy that are put in reach of people not able to access market housing. The council is currently working with partners, local communities and developers to deliver 1,000 new affordable homes each year by 2024.... The greatest need in Bristol is for social rented affordable homes.” Given the low numbers of units and the expected premium prices within this Clifton development, even with the relevant discounts and financial support, this provision appears to be an insignificant token gesture. It will not deliver any meaningful public benefit towards the core affordable housing objective for Bristol.

7. We therefore consider that the primary test set out in the Framework, that the loss of the heritage asset is necessary to achieve those public benefits, is not satisfied.

8. The significance of the site, in conservation terms, extends far beyond the gardens.

9. The site contains a number of Grade II listed buildings whose significance is inextricably linked to the historical use and development of the site as a zoological facility. These include the Clifton Pavilion, Great Aviary/Parrot House, Giraffe House and the museum and activity centre. The loss of these buildings to residential use would erase all connection with the history of the site and its former use. (As would the proposed loss of the herbaceous border where so many people’s ashes have been spread.)

10. These buildings constitute a unique and irreplaceable link to a nationally important past. The loss of these buildings is in no way necessary to provide new residential apartments, which could certainly be provided within a more sensitive redevelopment of the site which secured the preservation of the historic buildings and an appreciation of their former use. Here again, the primary test set out in the Framework is not satisfied.

11. Furthermore, and set against this harm, we consider the public benefits of the proposal have been overstated. Public access to the site will be strictly controlled and time limited. The most likely public perception and experience of the site will be as an enclosed, gated, walled and very exclusive, housing community into which cars have been introduced for the very first time.

12. This will severely limit the public appeal of the site to people repeatedly attracted from across Bristol and the South West - which as the Zoo's data shows was previously the case. It will greatly degrade the site's value as a historic and community asset. Any public benefit in this regard will be very limited.

13. For local residents, the marginal public benefit of access gained to this site is insignificant compared with the existing, continuous 24/7 free public access provided by the adjacent and much larger and more spacious Clifton Downs – without any overbearing housing and full of carefully managed, mature trees and vegetation and open skies.

14. The local harm caused by the proposed development to the existing gardens and the surrounding neighbourhood and conservation area is considered to be far greater than the new benefits of extra access to an asset so severely diminished. This appears to be the viewpoint of 95% of the local community as evidenced by the continued, increasing and high level of objections – with an almost complete absence of local supporters for the development.

15. As far as the provision of new housing and community facilities is concerned, we consider the benefit of such provision to be severely compromised by a design and layout that would grossly overdevelop the site, to the detriment of the character, appearance, significance and setting of the Clifton and Hotwells Conservation Area, the zoological facility, its gardens and the listed buildings.

16. In particular, we consider the size, scale, height, repetitive form, design and massing of the development to be singularly lacking in the refinement and articulation that characterises existing surrounding development and which the perimeter development is directly adjacent to. The surrounding neighbourhood is compromised predominantly of large detached and semi-detached villas interspersed with some small-scale Victorian terracing, alongside individually designed institutional buildings, many of historic importance and all with pitched roofs. The scale, contrast and intensity of the proposed blocks of flat roofed perimeter development, rising up to a full six storeys in height often in close proximity would overpower existing buildings and utterly dominate the immediate surrounding townscape, as well as much of the character of the gardens themselves.

17. Far from being sympathetic or complementing the unique and special characteristics of the site and its surroundings, the proposed development would impose its own scale, form and character in a most egregious example of town cramming and “garden grabbing”. The resulting development would largely obliterate any appreciation of the original spatial characteristics and landscape quality of the zoological facility and its setting within the local townscape. The gardens would become enclosed and much of the immediate neighbourhood become enclosed and overpowered.

18. In no way can such a level of contrast in mass and design be considered sympathetic or enhancing as explicitly required under the NPPF: “decisions should ensure that developments are sympathetic to local character and history; including the surrounding built environment and landscape setting” while the November 22 Local Plan Review states that new development “will not be permitted where it would be harmful to local character and distinctiveness” and “be neighbourly, safeguarding the amenity and sustainability of existing development”.

19. We would add that the submitted computer generated images provided are highly selective, featuring views that fail to show the full extent of the development or which depict the proposed buildings from either an elevated or distant vantage point, thereby giving a misleading impression of the

true scale and extent of the proposed works. The Town and Visual Impact Assessment also failed to provide accurate scale representative views of the proposed site development from the street.

20. When these computer-generated images are compared with the elevational plans, it is abundantly clear the extent to which the full size, scale, height, bulk and massing of the buildings has been deliberately downplayed by the careful use of perspective and angle of view. Neither are these images shown clearly in the context of other or existing historic buildings and the surrounding conservation area.

21. In addition, imaginative depictions of non-existent trees and completely improbable, planted vegetation have been created to hide or disguise the overwhelming impact of the buildings and their unsympathetic design. The most recent egregious example was for a CGI view of Northcote Rd submitted in January. This included images of 2 large mature trees (estimated at least 50 years old) that would neither be permissible nor possible in two such small private 5 metres square gardens, so directly adjacent to the building. Conveniently, these images of trees obscured all views of the block from this particular chosen CGI generated street view. The images also failed to show the contrasting incongruence of the design by only depicting the Victorian terrace opposite in simple outline rather than visual detail. This is a completely misrepresentative and misleading image, intended to hide the obvious adverse impact of the development on its surroundings.

22. The reality is the development would be built out on a truly monolithic scale, overwhelming the surrounding buildings by its combination of mass, height and proximity and its repetitive, completely contrasting and unsympathetic form, giving rise to an extremely dominant and overpowering relationship with the existing surrounding development.

23. Such a scheme self-evidently fails to respect and preserve the special character and unique significance of the site and the numerous heritage assets.

24. The Framework makes it clear that great weight must be given to the conservation of heritage assets. Special justification is required where, as here, proposed development would lead to substantial or total loss of significance. Our analysis shows that the appropriate justification has not been demonstrated and, further, that the design quality of the scheme falls far below the standard demanded of such a sensitive and nationally important site.

25. In all these respects, the proposal fails to achieve an appropriate design, height, scale, massing, form and layout of development for the site such that the development would contribute positively to the area's character, reinforcing local distinctiveness and safeguarding heritage assets and the character and setting of historic buildings, gardens and conservation areas, as required by Policies BCS20, BCS21 and BCS22 of the adopted Bristol Core Strategy 2011 and Policies DM26, DM27, DM28, DM29 and DM31 of the adopted Bristol Site Allocations and Development Management Policies Local Plan 2014.

#### Section B: Unnecessary and Insufficiently Mitigated Harms to Residential Amenities

1. The proposal is equally problematic in terms of the effect on the amenities at existing nearby residential properties.

2. Whilst noting the daylight and sunlight assessment carried out on behalf of the applicant, it is our view that the development would lead to a significant material loss of light to important habitable room windows in existing neighbouring residential properties. Our client has commissioned a separate,

independent daylight and sunlight assessment to support their concerns. The findings of this assessment have been submitted under separate cover.

3. Our client is still awaiting additional information from the Zoo's light consultants subsequent to their own advisers' report: "With regards to the NSL results, we have requested the survey information obtained on site by Anstey Horne, so we can update our assessment to ensure that the NSL results are based on the most accurate information. Once we have this, we will be in a position to re-run the NSL results and submit the supplementary information for the officer to review." This information has been provided by Anstey Horne to the Zoo's light consultants.

4. We will not reproduce the findings of that report here. However, it is worth highlighting a number of critical deficiencies which must cast doubt on the validity of the applicant's daylight and sunlight assessment. In particular, we have found that the plan depth of numerous habitable rooms within the adjacent properties to be as much as 5.2m and not 4.0m as assumed in the applicant's assessment.

5. The consequences of this are significant and materially alter the outcome of any assessment under the BRE (Building Research Establishment) guidelines.

6. Having assessed the individual properties at 1-6 Northcote Road, it is clear that many internal living areas that were previously found to fall within acceptable limits in terms of the reduction in daylight and sunlight can now be shown to fall beyond those limits.

7. This demonstrates that the applicant's assessment does not provide an accurate or acceptable evidence base for the design and layout as proposed. On the contrary, the evidence shows that the proposal in its current form would breach the BRE guidelines on numerous counts, causing material harm in terms of a reduction in daylight and sunlight to important habitable rooms within neighbouring properties.

8. The recent Zoo response to the Case Officer and Anstey Horne report states that "it is important to note that the retained VSC levels to 78 (93%) of the 84 windows are at above 20% which is considered acceptable and shows that the rooms will remain with the potential to receive good levels of daylight." Factually, this statement is incorrect – their own data table in the appendix of the original daylight report identifies 22 windows with a retained VSC below 20%. This equates to 26.2% of all windows in the terrace and NOT the 2.4% implied by the suggestion that only 2 relevant windows out of the 84 windows were adversely affected. Elsewhere, it has been stated by the Zoo's consultants that "Essentially if a window remains with 27% visible sky it is considered to be well-lit".

9. There seems to be a consistent pattern of dismissive, casual conclusions and use of data to obscure the fact that there are significant losses of daylight and sunlight to the residents which even regardless of BRE guidance, harm the residential amenity unnecessarily when these could be mitigated with some appropriate adjustments in height or setback.

10. Such suggestions have been made and ignored. The client does not believe there has been sufficient "proactive and effective engagement with the (Northcote Rd) community" (NPPF) with regard to this important matter after the very early stages of consultation.

11. Furthermore, it should be noted that the BRE guidelines used to inform the daylight and sunlight assessment take no account of loss of outlook. This typically occurs where a development has an

oppressive or overbearing impact by reason of its size, scale, height, bulk and proximity to existing residential development. This critical matter must be assessed on its merits having regard to the relevant circumstances in each case.

12. Here, the excessive size, scale, height, bulk and massing of the proposed development in such close proximity is uncharacteristic of the conservation area and again exceeds acceptable limits.

13. The outlook from adjacent residential properties on all sides would be dominated by massive blocks up to five or 6 storeys in height, in close proximity and unalleviated by sufficient separation, setback and articulation to soften and relieve the built form.

14. Many residents currently enjoy a relatively unrestricted outlook out across the local area from their upper floor windows. The massive scale and height of the proposed development at such close proximity would utterly dominate and obliterate that outlook for almost all of the residents' primary living spaces. Combined with the material loss of light that would result from the development, the overall impact would be oppressive in the extreme and in no way consistent with the well-established characteristics of the local area where residential buildings are smaller than the proposed blocks and where housing setbacks and distances between directly opposing housing are very much greater (at least 28 metres and often more than 35metres)

15. We would add that the overall degree of enclosure resulting from the development would far exceed the general standards for the local area, especially for Northcote Rd - a point that is confirmed by the applicant's Townscape and Visual Impact Assessment. By virtue of their combination of height and close proximity to buildings directly opposite, blocks in this proposed development often exceed the "25 degrees rule" frequently used as proxy guidance for loss of sunlight and increased overshadowing. The adverse urbanising and enclosing effect of this development harms both the setting of the heritage assets and the amenities at existing residential properties.

16. In addition, the development would inevitably increase overlooking between the upper floor windows in the proposed and existing neighbouring residential properties. The overall impact would, in our judgement, be extremely overbearing and intrusive.

17. Taken as a whole, we find that the proposal fails to safeguard amenity and ensure appropriate levels of privacy, outlook and daylight for existing development, as required by Policy BCS21 of the Core Strategy, Development Management Policy DM27 and the relevant provisions of the Framework.

## Conclusions

1. In conclusion, we cannot stress enough the need to appreciate the unique importance of this site, both to the local community and as an established, nationally recognised zoological facility. The development affects numerous designated heritage assets. Any loss of significance in this regard would be irreversible and, in national policy terms, requires special and over-riding justification.

2. We consider the degree of harm that would be caused in this cause would amount to 'substantial' harm, in the terms set out in the Framework. Approval in such cases should only be granted exceptionally where there is an over-riding justification in the public interest.

3. However, we have shown that this proposal would deliver either limited public benefits, or that the nature of those benefits need not preclude a more sensitive scheme, whereby the significance of the heritage assets could be better preserved for the benefit of existing and future generations.
4. The planning balance in such circumstances must weigh overwhelmingly against approval.
5. We have demonstrated that further significant harm would result to the amenities of existing neighbouring occupiers.
6. Furthermore, it is clear from our analysis and the evidence provided by local residents that the proposal is based on inaccurate, incomplete and unrepresentative evidence, which fails to correctly quantify and accurately or realistically depict the impact on the surrounding residential properties.
7. This only reinforces our firm view that this is an inadequately conceived and unsympathetic proposal which would grossly overdevelop this extremely sensitive and important site to the detriment of its character, appearance, heritage, setting and amenities.
8. The resulting development proposal contravenes important national and locally adopted development plan policies for the protection of local character, heritage and environmental quality, as set out in detail above.
9. We urge the Council to uphold those policies and refuse planning permission for the reasons stated.
10. Given the significance of these matters both in planning terms and for local residents, we formally request that the Members of the relevant planning committee arrange a site visit to enable Members to view the site and fully appreciate the true impact of the proposal before determining such an historic and sensitive application. We request that this visit includes walking along the Grand Parade within the Gardens and around the perimeter wall streets including Guthrie Rd, Northcote Rd and Clifton Down. For a site of such importance and sensitivity, this visit would benefit by being accompanied with accurate, unembellished scale images from a ground viewpoint in order to much better visualise the scale and potential impacts of this proposal on the heritage asset of the Gardens plus the likely adverse impacts on the wider Conservation Area and its residents. Our clients would also welcome visitation to some of the neighbouring affected residential properties so that they can better understand the loss of outlook and residential amenity.

Yours faithfully

Humphreys & Co.

Pollution Control 1 of 2

Date: 15<sup>th</sup> July 2022

I have no objection to this development but would just need to try to ensure that existing residents are not caused harm by the redevelopment of the site and that residents of the development are not caused harm by the community/commercial uses at the development. I am happy with the proposals made in the management plan submitted with the application regarding the community/public use areas.

I would therefore ask for the following conditions should the application be approved:

Page | 116



### 1. Construction Management Plan

No development shall take place until a site specific Construction Management Plan has been submitted to and approved in writing by the Council. The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting.

#### Advice

The Construction Environmental Management Plan should also include but is not limited to reference to the following:

All works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the Local Planning Authority, shall be carried out only between the following hours: 08 00 Hours and 18 00 Hours on Mondays to Fridays and 08 00 and 13 00 Hours on Saturdays and at no time on Sundays and Bank Holidays.

Mitigation measures as defined in BS 5528: Parts 1 and 2 : 2009 Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise disturbance from construction works.

Procedures for emergency deviation of the agreed working hours.

Control measures for dust and other air-borne pollutants .

Measures for controlling the use of site lighting whether required for safe working or for security purposes.

Procedures for maintaining good public relations including complaint management, public consultation and liaison.

### 2. Details of Kitchen Extraction/Ventilation System (Class E & Class F uses only)

No equipment for the extraction and dispersal of cooking smells/fumes shall be installed until details including method of construction, odour control measures, noise levels, appearance and ongoing maintenance have been submitted to and been approved in writing by the Local Planning Authority. The approved scheme shall be installed before the installation of any such equipment and thereafter shall be permanently retained.

#### Post commencement

### 3. Noise from plant & equipment affecting residential

The rating level of any noise generated by plant & equipment as part of the development shall be at least 5 dB below the pre-existing background level at any time at any residential premises.

Any assessments to be carried out and be in accordance with BS4142: 2014+A1:2019 Methods for rating and assessing industrial and commercial sound

### 4. Use of Refuse and Recycling facilities (Class E & Class F uses only)

Activities relating to the collection of refuse and recyclables and the tipping of empty bottles into external receptacles shall only take place between 08.00 and 20.00 Monday to Saturday and not at all on Sundays or Bank Holidays.

### 5. Opening hours (Class E & Class F uses only)

As detailed in the application I would ask that these be restricted to 07.30 to 22.30

Mark Curtis

Pollution Control Team

Bristol City Council

### Pollution Control 2 of 2

Date: 6<sup>th</sup> December 2022

Following the submission of further documents regarding this application, including a noise assessment and comments in the planning statement regarding Clifton College Music School I would comment further on noise as follows: I am happy with the noise assessment and would agree that if 'the mitigation measures and design requirements outlined in this report are implemented, the development will meet the requirements of National and Local Policy'. The noise assessment does not however make any

assessment of noise from Clifton College Music School. Noise from the school is mentioned in the planning statement which finds that based on a number of assumptions finds that noise from the school should not be an issue or can be suitably mitigated against. I would agree with this but as this is largely based on assumptions and probabilities, I do feel that further information will be required by condition. I would therefore ask for the condition below should the application be approved. 1. Sound insulation of residential properties from external noise All recommendation detailed in the Noise Assessment submitted with the application with regards to sound insulation and ventilation of residential properties shall be implemented in full prior to the commencement of the use permitted and be permanently maintained. 2. Assessment of noise from Clifton College Music School. No commencement of use shall take place until a noise risk assessment, in accordance with ProPG: Planning & Noise Professional Practice Guidance on Planning & Noise New Residential Development (May 2017), has been submitted to and approved in writing by the Council. The assessment should take into account noise from Clifton College School including the Joseph Cooper Music School. The noise assessment shall be carried out by a suitably qualified acoustic consultant/engineer and, if necessary, shall include a scheme of noise insulation measures. Any approved scheme of insulation measures shall be implemented prior to the commencement of the use and be permanently maintained thereafter.

### Public Art Team

Date: 13<sup>th</sup> December 2022

In general I'm in support of the updated cultural strategy and approach as submitted by Gingko in line with the altered proposals

- In support of extension of public opening times from 8am - 5pm, with opportunity for curated events in the evening
- In support of the enhancement of the public experience through increasing the permeability of the edges (more entrances)- culture and public art could play a strong role here in welcoming public into the site.

The following condition is advised in the event of approval: In accordance with the submitted Outline Public Art and Culture Strategy, and prior to commencement of the development, further details of the Public Art commission(s), including a timetable for implementation, shall be submitted to and approved in writing by the Local Planning Authority in an updated Public Art and Culture Strategy. The public art works shall be implemented and completed in accordance with the approved details, unless otherwise agreed in writing by the Local planning Authority.

Reason: To ensure the delivery of Public Art and Culture throughout the development and to allow for successful integration into the design and build process where relevant

### Save Bristol Zoo Gardens

Date: February 2022

The Campaign to Save Bristol Zoo Gardens (SBZG) started with an investigation into how the Zoological Society had made its decision to close the Clifton site and into the business reasons provided. The Campaign found that these reasons which would support their claim that the Zoo was no longer viable on the Clifton site were unfounded. The following points below specify how the application is in breach of planning law and policy.

#### Change of Use not justified

The Campaign has enlisted the support of accountants and a former Zoo Director who have confirmed that there is no reason the 186 year old site should not continue in business as a successful visitor attraction. Income, profitability and visitor numbers had all been positive in the

decade preceding 2020 and all showed sign of recovery to their pre-Covid levels prior to the Zoo's closure. The picture of the Clifton site as an inevitable failure is false and the decision to sell all their property in Clifton was taken to provide capital funds for their Wild Place Project in Gloucestershire.

Both Local Plan policy DM5 and Core Strategy Policy BCS12 make direct reference to the fact that the loss of Community Facilities will not be permitted unless it can be clearly demonstrated that there is no longer a demand for the facility or that the building/s are no longer suitable to accommodate the use and the building cannot be retained or adapted to another community use. Furthermore Policy DM5 goes on to state that the loss of a community facility will only be acceptable if a replacement facility can be provided in 'a suitable alternative location'. The Zoo's own figures indicate that there is still a continuing demand and zoo keepers and zoologists confirm that the site is suitable for certain species of animal. Many alternative community uses have been proposed, ranging from a city farm to an Eden Project style gardens. Sufficient time has not been given to explore these possibilities or their funding. The Wild Place is not a suitable alternative location, requiring car transport, whereas a city zoo is easily accessed by public transport, bicycle or on foot.

#### Ecology and Sustainability

The Bristol Tree Forum has already challenged the Zoo's claim of a 38% increase in biodiversity as it is based on outdated methodology. They estimate the outcome to be a 22% net loss. The loss of trees is excessive and experts fear for the remainder when surrounded by building works and then by tall buildings. The proposal to plant '2 for 1' is less than the Council's Tree Replacement Standard.

Demolition and rebuilding is not the preferred approach by RIBA due to the loss of embodied energy in demolition and the carbon cost on construction materials. A Bristol environment expert supporting the Campaign estimates the carbon cost of the construction proposed on the site would be equivalent to running the existing buildings for 2500 years. Adaptation or reuse is to be preferred.

#### Public amenity

The proposed public access and maintenance of the gardens is to be funded by a levy on the residents. But there is insufficient evidence that this right will be granted in perpetuity as this access is permissive and could be modified or withdrawn. It is the prediction of many objectors to his scheme that the residents will object to funding a public amenity and in time it will become a private space.

The scheme provides no long term protection of public access. This could be provided by the dedication of the site for public access in perpetuity under section 16 of the Countryside and Rights of Way Act 2000, which would be binding on subsequent owners. Alternatively, designation as a town or village green. The Zoo could apply for voluntary registration under the Commons Act 2006

#### Harm to overall historic interest and significance of site

The May 2022 Heritage Statement acknowledged the harm that is caused to the site and Conservation Area through the departure of the Zoo from its historic home, a point echoed by Historic England. The SBZG disagrees that this harm is justified by the current proposal. The

significance and irreplaceability of the site as a whole is fundamental to this application. Bristol Zoo Gardens is the oldest one in the UK and the fifth oldest in the world. It has been open for 186 years. NPPF 189 states: 'These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'.

#### Loss of Communal Value

Defined as 'Value deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.' in English Heritage, Conservation Principles, 2008. At the public level, hundreds of thousands of people have visited the Zoo as children, as adults and with their own children for more than 150 years and the loss of this experience is not to be taken lightly. Additionally, the ashes of many people have been scattered within the herbaceous borders - to be lost under a roadway - while others have held weddings and celebrations in the Pavilion, which will be lost to flats.

#### Harm to listed buildings

The original and particular use of many of the buildings is integral to their historic significance and is cited as a key reason in the listing designations of the four animal houses on the site, justifying their listing at Grade II and their national importance. Harm to an asset of this significance should clearly be only as a last resort. The D&A statement refers to 'Historically significant buildings retained and sensitively converted to unique, environmentally sustainable homes'. But the SBZG finds that such conversion would completely change the presentation and significance of these buildings, meaning the loss of: the Clifton Pavilion, Great Aviary/Parrot House, Giraffe House and the Museum/Activity Centre, all to apartments. It is not considered that the applicant has made the case for the level of harm proposed to the listed buildings within the site.

#### Justification of harm

It is recognised by the NPPF that new uses are sometimes needed for heritage assets to generate income for their long-term future. In order to do this, it may be necessary to cause some harm, but it is clear that in identifying the 'optimum viable use' for a heritage asset, the optimum viable use is one that causes the least harm to significance. The SBZG argues that the proposed scheme would cause significant and irreversible harm and is not justified.

#### Alternatives

Other proposals for the site have been put forward either in broad outline or in detail and this suggests that other schemes are possible. Covid has provided a distraction so that disposal of the site is presented as a finished decision. But this is a nationally important site and time could usefully be taken to allow further time for ideas or to run a competition to determine its future. The Campaign's preference is that it reopens as 'a Zoo fit for the 21st century' which was the Zoo's strategy up to 2020.

#### Design

Even if there were no alternative to building densely on the site, the proposal is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over-intensive with a consequential poor relationship with the adjacent school and its listed buildings. The north building

at six storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular the Bear Pit would be overly dominated by new development.

#### Landscape

Bristol Zoo Gardens are a locally listed heritage asset designated as a Local Historic Park/Garden and an Important Open Space. The Avon Gardens Trust has voiced concerns around the loss of trees, the viability of translocating other trees and hedges and the general impact on green infrastructure from ground and environmental disturbance during the long phases of works and the eventual overshadowing from tall buildings.

#### Cars and Parking

The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought not least as it creates another visual and psychological barrier for free pedestrian access to the green spaces within the site. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site.

SAVE Bristol Zoo Gardens Campaign

February 2022

### Sustainable City Team (BCC) 1 of 3

Date 15<sup>th</sup> July 2022

Core strategy policies relating to sustainability include BCS13-16. In addition, BCS10 (Transport and Access) also has relevance to sustainability.

The relevant Site allocations and development management policies supporting the core strategy policies in relation to sustainability are: DM15, DM17, DM19, DM29.

Full technical guidance on how to implement the above policies can be found within Bristol City Council's Climate Change and Sustainability Practice note.

#### 1. Sustainable City comments

Overall, the proposals are well aligned to the objectives of BCC sustainability planning policy.

However, we request further information around some elements of the heating system as detailed below.

#### BCS13 – Climate Change

Overheating modelling shows overall a good level of resilience to overheating under future weather scenarios. Though some risk is identified in 2050 and 2080 this can be mitigated with increased window opening.

Cycle parking, EV charging, and car club provision are all proposed in line with policy to support more sustainable transport options.

Extensive green infrastructure is proposed to improve biodiversity of the site, alongside a range natural water management features. There is a strong focus on multi-functional benefits of

landscaping.

#### BCS14 - Energy

Very good U-values and air tightness are proposed with high efficiency LED lighting and MVHR with summer bypass throughout. Fabric improvements and connection to the local heat network are proposed for all existing buildings that are to be refurbished for dwellings.

The overall heat strategy is well considered and the use of different heat pump sources to feed a local low temperature network offers a low carbon approach that is supported. However, electric boilers are proposed for back up and to meet peak heat demand in the coldest months. Though we would accept these in place for back up alone, their usage for peak heat provision is problematic as direct electric heating is not compliant with the heat hierarchy set out in BCS14.

Though we note that they are only anticipated to provide 0.2% of heat demand and recognise they are considered preferable to gas, we would like to see some further information around the following:

- Explanation as to why low carbon heat sources can't be increased to meet the full heat demand.
- Has heat demand been calculated based on SAP alone? Though we currently recommend the use of SAP for energy calculations, the methodology is known to underestimate heat demand so there is a risk that the boilers may be used more than predicted.
- Could connection to the heat network to meet peak demand in the future be explored?
- Though there are no current networks in the area, it is likely there will be in future.

Extensive PV is proposed and will well exceed the 20% renewables target. More information on the PV will be required at a later stage.

#### BCS 15 Sustainable design and construction

A BREEAM communities scoping assessment has been undertaken as required, and all BCC recommended credits and some additional credits deemed to be relevant. The development meets the principles set out for the relevant credits. This demonstrates that wider sustainability principles are being considered across the project.

We are pleased to see that a structural embodied carbon assessment has been undertaken to inform early design choices. A target 'grade E' SCORS rating has been set and not all areas are anticipated to meet the target based on current plans. As this appears to be a relatively low target, we recommend that all the measures identified to improve performance are implemented if feasible at detailed design stage.

We welcome the commitment to reduce mains water consumption and the target of 95/l/day.

#### 2. Recommended conditions

If/when permission is granted, we anticipate conditions will be required in relation to:

- Energy and sustainability in accordance with approved statement
- PV
- Heat pumps
- Air tightness

## Sustainable City Team (BCC) 2 of 3

Date: 15<sup>th</sup> December 2022

Core strategy policies relating to sustainability include BCS13-16. In addition, BCS10 (Transport and Access) also has relevance to sustainability.

The relevant Site allocations and development management policies supporting the core strategy policies in relation to sustainability are: DM15, DM17, DM19, DM29.

Full technical guidance on how to implement the above policies can be found within Bristol City Council's Climate Change and Sustainability Practice note.

### 1. Sustainable City comments

Further to initial comments provided in July:

Detailed SAP outputs are provided for a sample of dwellings at each stage of the energy hierarchy. Additional energy data has now been provided showing summary figures for each residential block. This methodology is as required under BCS14.

As SAP 2012 carbon factors were in use for Part L 2013 at the time of the initial submission, the use of these carbon factors has been continued for the revised statement (rather than Part L 2021). For the purpose of BCS14 calculations we consider this to be acceptable.

We have some queries in relation to the figures provided and request that further information is provided on:

- Detailed calculations of how the carbon emissions figure (kgCO<sub>2</sub>pa) are derived from the energy demand (kWhpa) in the summary table, including a breakdown of fuel type (e.g. gas, electricity, district heating etc) and carbon emission factor used at each stage of the energy hierarchy.
- 'Appendix B6 – SAP model calculation outputs for each residential block' provides a total CO<sub>2</sub> figure of 191,042kg PA but 194,594kg PA is shown in the summary table – we request that this be clarified.
- The DER worksheets provided after residual measures for dwellings E1\_30\_sw\_g and LH\_85\_n\_1 do not align with the corresponding figures shown in the summary for each residential block.
- The 3 sample dwelling SAP outputs provided all show a carbon saving from PV that is lower than the 32% stated in the summary tables. We note that there is wide variation in the levels of PV provided on different buildings and request that SAP outputs are provided for further sample dwellings from more blocks including those with both high and low levels of PV proposed.

*ACTION: Points to be addressed in an addendum or revised energy strategy.*

Further information regarding the use of electric boilers was provided by the applicant team in June 2022. This states that increasing the number and/or size of the heat pumps to meet the peak demand would add significant building mass and mean the loss of PV and green roof area. The peak demand figure has been calculated using CIBSE heat network code of practice methodology. This is considered acceptable, we have no further objection to the use of electric boilers in this instance given the small proportion of demand and the usage as part of a low carbon site wide heat network.

Notwithstanding the queries above related to the energy data, the proposed measures appear in full

compliance with the objectives of BCS14:

- Good practice levels of energy efficiency are proposed, improving on Building Regulation standards to minimise energy demand.
- In accordance with the heat hierarchy, a site-wide district heating network is proposed with over 99% of heat to be provided by heat pumps. Though heat networks are treated as an energy efficiency measure for the purpose of BCS14, heat pumps are considered a renewable technology. Therefore, although in the energy calculations only PV is counted towards the carbon reduction from renewables, in fact the renewable energy generation on site is greater than is illustrated by this figure.
- Extensive PV is proposed across the suitable roof space to further reduce carbon dioxide emissions from residual energy use.

BCS15 – sustainable design and construction

Whilst we welcome the embodied carbon assessment provided, we reiterate our previous point that the targets set are not stretching and do not align with established industry good practice. BCC's new draft local plan policies have now been published for consultation and, if adopted, new development will be expected to achieve the following targets for embodied carbon:

- Residential (4 storeys or fewer) - <625 kgCO<sub>2</sub>e/m<sup>2</sup>
- Residential (5 storeys or greater) - <800 kgCO<sub>2</sub>e/m<sup>2</sup>

We note that further efforts will be taken at detailed design stage to reduce embodied carbon and strongly recommend that the development aims towards the targets highlighted above.

However, as no embodied carbon targets are set in adopted policy, we do not consider this to be a compliance issue.

The requirements of BCS15 are met in other areas including good practice targets for water efficiency, an extensive sustainable drainage plan, provision of biodiverse green roofs, and specific targets in relation to waste and responsible sourcing of materials.

**Sustainable City Team (BCC) 3 of 3**

Date: 17.01.2023

The recently submitted information addresses the concerns raised in the Sustainable City Team's previous comments

**The Victorian Society 1 of 2**

Date: 22nd July 2022

Dear Case Officer,

RE: 22/02889/LA | Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure. Works to listed building including: access-works to the Guthrie Road entrance gates; the conversion of the Entrance Lodge to facilitate community floorspace, the residential conversion of the Giraffe House, and various restoration and refurbishment works to the Aquarium (former Bear Pit), Monkey Temple, and Birds of



Prey Aviary to secure their future as part of accessible landscaped gardens. | Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

Thank you for consulting the Victorian Society on this application. It was presented to the Society's Southern Buildings Committee, a group of architects, historians and heritage professionals. Following its advice we write to make this objection.

Bristol Zoological Gardens is a site of high architectural and historical significance. The fifth zoo to open in Europe, it is one of only three remaining 1830s zoological gardens in the British Isles. Its rarity as an early example of this type of landscape, its surviving historic zoological buildings, and continued use for its original purpose make it extremely significant. Furthermore, its place within the Clifton Conservation Area and relationship to nearby listed buildings mean that the Gardens are very sensitive and significant alteration is likely to cause a degree of harm not just to the Gardens themselves, but to the Conservation Area and nearby heritage assets.

The Victorian Society understands Bristol Zoological Society's desire to vacate the Gardens and we acknowledge that the principle of some degree of residential development could be acceptable. Irrespective of any future redevelopment, however, the departure of the zoo from the site will seriously harm the historic significance of the Gardens. We are also concerned by aspects of the design of the proposals.

Bristol Zoological Gardens is characterised by its low density, small scale, historic (listed) buildings, situated within a mature landscape, contained within a perimeter wall. This means that although the Gardens retain a discreet character of their own, distinct from the surrounding Conservation Area, they nonetheless make a positive contribution as an oasis within the surrounding built environment. The zoo does not compete with the neighbouring buildings for prominence, and it succeeds in preserving an openness towards the Downs. Importantly, despite alteration since opening in 1836, the site remains legible as a historic 19th century Zoological Gardens within a wider 19th century locality, something, as noted above, which is exceptionally unusual and significant.

The proposed development would seriously harm the significance and character of the site and the Conservation Area. The density and height of the new buildings would represent a gross overdevelopment and erode the character and legibility of the historic landscape. The height of the buildings around the perimeter of the site mean that the gardens would be cut off completely from the surrounding Conservation Area, effectively turning them into gardens for the benefit of the new development, rather than the wider locality. The height of the buildings would also harm the Conservation Area and nearby listed buildings by introducing a scale, form and architectural idiom at odds with the Conservation Area. The new buildings would compete with the listed Clifton College and the nearby 19th century housing, diminishing their prominence. They would also destroy any impression of openness linking the site to the Downs. These effects would be heightened by the lack of significant gaps between the proposed buildings, especially those to the north west and north east. Any acceptable proposal would be of a lower scale and density, better preserving the Garden's character and positive contribution to the Conservation Area.

Ultimately, this gives rise to the concern that the proposed development is not informed by a full understanding of the history and character of the site. Surviving zoological gardens of the 1830s are very rare and it is important that proper study of the site is undertaken to identify which parts of the original design survive. Any proposals must be based on these findings and seek to enhance and sustain this significance, ensuring that the gardens remain a heritage asset which can be fully appreciated by the public.

The NPPF is clear that it is desirable to 'sustain and enhance' the significance of heritage assets (para 190a), and that 'great weight should be given to the asset's conservation' (para 199). Furthermore, that 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their

significance.’ (para 206). This proposal would not enhance or better reveal the significance of the site and nearby heritage assets. The Victorian Society objects to the proposal in its current form.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

Connor McNeill

Conservation Adviser

## The Victorian Society 2 of 2

Date: 27<sup>th</sup> January 2023

Thank you for consulting the Victorian Society on amendments to the original proposals for the redevelopment of Bristol Zoological Gardens. However, having reviewed the latest documentation our objection remains. In our previous objection we drew attention to the site’s high significance as one of Europe’s earliest zoological gardens, and one which continues in this use. Furthermore, we highlighted the important role it plays in contributing to the significance of the Clifton Conservation Area and the setting of nearby designated and non-designated heritage assets. The proposals which would see the site adapted to a new use, with a quantum of development alien to the character of the site and the Conservation Area, would cause serious harm to significance as outlined in our previous consultation response. The amendments which comprise of minor design changes do not address these concerns and the proposals remain substantially as first presented. Our serious concerns about the harm the scheme would cause to the significance of the site, Conservation Area and nearby designated and non-designated assets remain. The NPPF is clear that it is desirable to ‘sustain and enhance’ the significance of heritage assets (para 190a), and that ‘great weight should be given to the asset’s conservation’ (para 199). Furthermore, that ‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.’ (para 206). The amended proposals do not ensure this, and the Victorian Society maintains its objection to the proposals. Connor McNeill Conservation Adviser Direct line 020 8747 5893 [connor@victoriansociety.org.uk](mailto:connor@victoriansociety.org.uk) Your reference: 22/02737/F Our reference: 180526 26th January 2023 [development.management@bristol.gov.uk](mailto:development.management@bristol.gov.uk) I would be grateful if you could inform me of your decision in due course.

Yours sincerely, Connor McNeill Conservation Adviser

## Transport Development Management 1 of 3

Date: 15<sup>th</sup> August 2022

TDM Summary

The information provided by the applicant is sufficient to secure support from TDM subject to obligations and conditions

TDM support the application because:

- The proposed development is consistent with national and local transport policy.
- The location of the site is accessible to pedestrians, cyclists, and public transport users.
- Site permeability to pedestrians also integrates the site with the surrounding pedestrian routes.
- Access to services, education and employment areas are within walking and cycling distance of the site, which is in line with local and national policies
- Satisfactory vehicular access can be achieved from College Road, Guthrie Road and Northcote Road. The provision of three vehicle access points distributes vehicles both around the site and local road network to minimise traffic impact. The details of which will be subject to S278 agreement.
- The internal site layout is able cater for all road users including service vehicles as shown

Page | 126

by swept path analysis.

- The level of car parking proposed is suitable for the location of the site given that local facilities are accessible by foot, cycle, and public transport, and that on-street parking is controlled by a residents parking zone for which new residents would not be able to purchase permits.
- The sustainable travel measures proposed including secure cycle parking in excess of the minimum standards, car club car, and the implementation of a Travel Plan at the site further would encourage the use of alternative modes of transport to the private car, reducing car parking demand.
- Comparing average traffic generation, the proposed traffic generation of the development would be less than the existing BZG traffic generation therefore there is a net traffic benefit of the scheme compared to the existing use of the site. This would also be the case when considering the cumulative impact of both the residential schemes at West Car Park and BZG.
- The proposed scheme would generate substantially lower levels of traffic than from the BZG use on peak BZG visitor days.
- There are no road safety concern on the local road network and there is no reason to suggest that that proposal would affect this situation.

The obligations and conditions

The obligations requested are considered required and meet the CIL Regulations 122 test, in that it would be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development

Obligations

- The extent and scope of the S278/ S38
- Contributions of £220 per residential unit for travel plan delivery and management or £5,693 where applicant will do their own delivery
- Contribution for road safety and sustainable transport improvements within 500m of the site £1,000 per unit. (£196,000)

Pre commencement conditions

B1B Approval of road works necessary

B38 Construction Management Plan – Major Developments

C. Pre occupation conditions

C7A Completion of Vehicular Access – Shown on Approved Plans

C8 Completion of Pedestrians/Cyclists Access – Shown

C35 Car Club

C36 Electric Vehicle Charging Points

File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments - Second\22.02737.F bristol zoo draft tDM comments rev.docx22/02737.F Bristol Zoo

TDM Assessment details

The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.

Officers have reviewed this application and identified the following areas for detailed comments:

- Road network - Access and Road Safety – The safe movement of all modes entering and exiting the public highway
- Trip Generation –The existing and proposed trips related to the site
- Active Transport – Walking and cycling and behaviour change
- Public Transport – Current access and future potential
- Servicing and Delivery – How the development will manage the vehicular trips required
- Car Parking - How the development will manage the vehicular trips required

#### Location

The site is bounded by the BZG North Car Park to the north west (with the A4176 Clifton Down beyond), Northcote Road to the north east, Guthrie Road to the south east, and College Road to the south west.

#### Constraints

- The BZG North Car Park on land controlled by the Downs Committee to the north west. The Downs Committee made clear that they would not support any motorised vehicle access to the proposed development that would impact on the existing layout.
- Northcote Road is one way northbound

#### Road Network

##### Strategic

The strategic route for motorised vehicles access connects:

- A4176 Clifton Down from the A4 Portway around 1km to the south west to the A4018, 1km to the north east. The A4018 continues north to the M5 junction 17 around 7km north of the site. To the south the A4018 continues into Bristol city centre around 2.5km to the south.
- A4176 signal junction with the A4 Portway some 1km to the south west of the site, the A4 continues north for some 8km to Avonmouth and the M5 junction 18A and south east some 3km into Bristol city centre.

##### Local Roads

- Northcote Road is a one way road northbound along the eastern boundary of BZG. continues north east to meet The Avenue at a priority junction immediately east of the BZG North Car Park. The Avenue meets Clifton Down 20m further north at a priority junction. To the south The Avenue continues approximately 290m to meet Guthrie Road at a priority junction.
- College Road bounds the site from junction with the A4176 Clifton Down to junction with Guthrie Road at a priority junction immediately north west of the site.. College Road also has a junction with Cecil Road junctions some 160m and 250 south east of Clifton Down respectively Raised tables are provided at both junctions. A right turn lane is provided on Clifton Down for around three cars to be able to wait to turn right into College Road
- Guthrie Road forms the southern boundary from junction with College Road, to junction with Northcote Road 180m east of College Road. Guthrie Road continues north east to Pembroke Road a further 170m north east.there are traffic calming measures - road narrowings and raised tables.

File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments - Second\22.02737.F bristol zoo draft tDM comments rev.docx22/02737.F Bristol Zoo

##### Speed Limit

A 30mph speed limit is in place on the A4176 Clifton Down, with 20mph speed limits in place on College Road, Guthrie Road, Northcote Road, and other streets to the south, east, and west of the site.

##### Road Traffic casualty assessment

The TS showed evidence covering a five year period January 2016 to December 2020 inclusive. Roads included in the review are the A4176 from Ladies Mile/Clifton Down junction to Pembroke

Road, College Road from A4176 to Guthrie Road, and the full length of Guthrie Road and Northcote Road.

- One slight accident occurred at the College Road junction with the A4176 Clifton Down to the north of the site with a car on College Road overshooting the junction and into the path of a vehicle travelling south west bound on the A4176.
- One slight accident occurred on the A4174 at the BZG car park exit where a vehicle leaving the car park hit a pedestrian walking along the footway on the A4174.
- Two slight accidents occurred at the A4176 junction with Ladies Mile and Clifton Down triangle some 150m to the west of the site,
- One slight accident was recorded on Guthrie Road, between the Northcote Road and The Avenue junctions.
- Three slight accidents, occurred at the A4174 junction with Pembroke Road.

Proposed changes to the public highway

The changes to the public highway will be subject to the S278 works which will include but are not restricted to the following:

- Extension to the raise table at the College Road/Cecil Road junction to include the proposed site access;
- Kerb build out at the northern end of Northcote Road to allow for the vehicle access and pedestrian crossing;
- Kerb build out at the southern end of Northcote Road to allow for pedestrian access and crossing.

Active Transport

Walking

The site is surrounded by prestige walking routes that access public transport, retail and leisure. A recent active travel survey was undertaken on 3rd March 2021. This identifies the good walking connections of the site but also sets out where the gaps are:

- Footways are provided adjacent to all roads in the vicinity of the site, with the exception of short sections on either side of College Road on the approach to the A4176 Clifton Down, on Northcote Road not along the perimeter wall of the BZG site on the western side of the road.
- A Puffin crossing is provided across the A4176 Clifton Down approximately 50m to the north east of the College Road junction. a footpath which continues across Clifton Downs to the north.
- On College Road a Zebra crossing is provided some 70m south of the junction with the A4176 Clifton Down.
- An uncontrolled pedestrian crossing with central island is also provided across College Road at the junction with Clifton Down.
- Tactile paving and dropped kerbs are provided at junctions to the south of the site, including the Guthrie Road junctions with College Road and Northcote Road.
- Three uncontrolled crossing points are provided on Guthrie Road with road narrowings, raised tables and tactile paving provided.

Example of the easy connectivity to retail;

- Alma Vale Road is some 600m to the east of the site with a mix of shops including the Clifton Mini Market convenience store, restaurants and cafes provided.
- The centre of Clifton Village is around 900m to the south of the site with a range of high end retail establishments, restaurants, and cafes. Co-op and Tesco Express convenience stores are also provided, along with a Post Office and pharmacy.
- Whiteladies Road is approximately 1km to the east of the site with a range of retail, restaurants and cafes provided.

## Internal Layout

The provision of three vehicle access points and vehicle turning areas around the site aims to distribute vehicles around the site and minimise the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow vehicle speeds through the space and encourage free flow of pedestrian and cycle movement.

## Cycling

There are no on-road or off-road cycle routes in the immediate vicinity of the site. However 135m from the western corner of the site a shared footway/cycleway is provided along the A4176 Bridge Valley Road, which in turn connects to the A4 Portway shared footway/cycleway some 1km to the west, providing a traffic free cycle route between Bristol city centre and Avonmouth.

## Cycle Parking

A total of 380 secure resident cycle parking spaces are proposed for the apartments, with each cycle store containing sufficient parking to provide at least one cycle space per bedroom of the associated apartment building. 40 cycle spaces will be provided for visitors. This is an acceptable quantum.

## Public Transport

### Bus

Bus stops are located on the A4176 Clifton Down immediately north of BZG, with the southbound stop just north of the junction with College Road, and the northbound stop a further 40m to the north east. The bus stops are equipped with real time information, shelters and timetables. The southbound stop is served by bus services 8 and 505 and the northbound stop by bus service 505. There are 7 further

### Train

Clifton Down train station is around 1km to the east of the site. Destinations served from this railway station include Bristol Temple Meads, Weston-Super-Mare and local stations of Redland, Montpellier, Lawrence Hill, Avonmouth and Severn Beach. Connecting services to destinations across the country are also provided from Bristol Temple Meads including London, Birmingham, Cardiff and Exeter and beyond. During the day Monday to Saturday services operate around every 30 minutes in both directions between Avonmouth and Bristol Temple Meads, continuing to/from Severn Beach and Weston-Super-Mare every hour. In the evening services operate every 30- 60 minutes from Temple Meads to Severn Beach. On Sunday an hourly service is provided between Bristol Temple Meads and Severn Beach.

## Trip Generation

The Zoo generally attracted more Weekend vehicle than the weekday. Events are also more frequent on weekends.

The analysis looked a differentiating between staff and visitor trips the average week

Daily 24 Hour -

Weekday BZG &

Associated Uses

Vehicle Traffic

Arrivals Departures Two-way

Generation

BZG Staff 81 81 162

BZG Visitors 288 288 576

Clifton Pavilion Visitors 129 129 258

Hide Visitors 94 94 188

Education Centre 33 33 66

Page | 130

Total 625 625 1250

#### Car Parking

The area around the site forms part of the Bristol Residents' Parking Scheme (RPS). On a number of the roads within the vicinity of BZG including College Road, Cecil Road, and Guthrie Road many of the bays are shared permit holder and pay and display use bays. Vehicles can park either with a permit or for a maximum of five hours using the pay and display bays Monday to Friday 09.00-17.00. Immediately adjacent to the site on Cecil Road permit holder only bays are provided also operating Monday to Friday 09.00-17.00. No restrictions are in place in the evening and during weekends.

The results of on-street parking surveys undertaken on:

Thursday 25th February 2021 at 20.0

Road No. of Cars Parked No. of Spaces Not Occupied

College Road (Clifton Down to

Guthrie Road

18 17

Guthrie Road (full length) 30 23

Northcote Road (full length) 17 44

Total 65 84

Wednesday 1st December 2021 at 20.00.

Road No. of Cars Parked No. of Spaces Not Occupied

College Road (Clifton Down to

Guthrie Road

32 52

Guthrie Road (full length) 7 35

Northcote Road (full length) 17 9

Cecil Road (full length) 12 26

College Fields (full length) 23 28

Clifton Down triangle east (full length

6 23

Clifton Down triangle south (full length)

0 30

Canynge Road (full length) 30 36

Total 127 239

#### Car Club

The application provides 1 car club and the provision of parking for this exact location to be linked to S278 process with the possibility of it being an electric car club car, subject to being able to achieve a charging point on street.

#### Internal parking management

The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan will be required to detail how this will be managed.

#### Travel Planning

The obligation contribution will be prioritised for reducing car dependency and the road safety of new residents and the relationship with Clifton College.

#### Construction Management

The construction management plan will be expected to demonstrate consideration of Clifton

College when managing the construction trips related to the site.

C. Pre occupation conditions

C7A Completion of Vehicular Access – Shown on Approved Plans

C8 Completion of Pedestrians/Cyclists Access – Shown

C35 Car Club

C36 Electric Vehicle Charging Points

Advices

I021A) Alterations to Vehicular Access

I023A) Oversailing

I024A) Works on the Public Highway

I025A) Minor works on the Public Highway

I026A) Traffic Regulation Order (TRO)

I027A) Highway to be Adopted

I028A) Public Right of Way

I043A) Impact on the highway network during construction

I044A) Restriction of Parking Permits – Existing Controlled Parking Zone/Residents Parking Scheme

I045A) Restriction of Parking Permits – Future Controlled Parking Zone/Residents Parking Scheme

I046A) New driveway in a Residents Parking Scheme or a Proposed Parking Scheme

I052) Highway Condition Survey

I053) Excavation Works on the Adopted Highway

I054) Private Road

I055) Street Name and Numbering

I056) Stopping Up/Diversion of Adopted Highway

I057) Stopping or Diverting a Public Right Of Way

I058) Sustainable Drainage System (SUDS)

TDM Response to transport related objections from consultees of the most recent consultation.

Re: Historic England

The evidence provided by the applicant shows the trips to the site will be significantly lower than it was as a zoo. (this is in comparison between servicing and delivery trips related to the Zoo site in operation against the proposed residential site not including the offsite visitor carparking).

To mitigate for the trip level for the new site the applicant will be contributing S106 for road safety and sustainable transport improvements in the vicinity of the site.

They are also contributing S106 for travel planning will be used to promote safer and sustainable travel by the future residents to discourage private car ownership.

All of the changes impacting the highway will be subject to safety audits and adjustments will be able to be made within the S278 works.

Officers therefore are satisfied any concerns can be satisfactorily mitigated for.

Clifton College

TDM officers have reviewed the concerns of Clifton College and feel there is no new concern that wasn't addressed previously by the applicant.

The internal streets have been designed to provide a liveable neighbourhood taking into account the needs of pedestrians and disabled users moving around the site.

The provision of three vehicle access points and vehicle turning areas around the site minimises the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow



vehicle speeds through the space and encourage free flow of pedestrian and cycle movement. The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan will be required to detail how this will be managed.

To mitigate for the any road safety concerns for the new site the applicant will be contributing S106 for road safety and sustainable transport improvements in the vicinity of the site.

They are also contributing S106 for travel planning will be used to promote safer and sustainable travel by the future residents to discourage private car ownership and the road safety relationship with the school

All of the changes impacting the highway will be subject to safety audits and adjustments will be able to be made within the S278 works.

Officers therefore are satisfied any concerns can be satisfactorily mitigated for.

### Transport Development Management 2 of 3

Date: 13<sup>th</sup> October 2022

#### TDM Summary

The information provided by the applicant is sufficient to secure support from TDM subject to obligations and conditions

TDM support the application because:

- The proposed development is consistent with national and local transport policy.
- The location of the site is accessible to pedestrians, cyclists, and public transport users.
- Site permeability to pedestrians also integrates the site with the surrounding pedestrian routes.
- Access to services, education and employment areas are within walking and cycling distance of the site, which is in line with local and national policies
- Satisfactory vehicular access can be achieved from College Road, Guthrie Road and Northcote Road. The provision of three vehicle access points distributes vehicles both around the site and local road network to minimise traffic impact. The details of which will be subject to S278 agreement.
- The internal site layout is able cater for all road users including service vehicles as shown by swept path analysis.
- The level of car parking proposed is suitable for the location of the site given that local facilities are accessible by foot, cycle, and public transport, and that on-street parking is controlled by a residents parking zone for which new residents would not be able to purchase permits.
- The sustainable travel measures proposed including secure cycle parking in excess of the minimum standards, car club car, and the implementation of a Travel Plan at the site further would encourage the use of alternative modes of transport to the private car, File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments\TDM Comments.docx22/02737.F Bristol Zoo reducing car parking demand.
- Comparing average traffic generation, the proposed traffic generation of the development would be less than the existing BZG traffic generation therefore there is a net traffic benefit of the scheme compared to the existing use of the site. This would also be the case when considering the cumulative impact of both the residential schemes at West Car Park and BZG.
- The proposed scheme would generate substantially lower levels of traffic than from the BZG use on peak BZG visitor days.

- There are no road safety concern on the local road network and there is no reason to suggest that that proposal would affect this situation.

The obligations and conditions

The obligations requested are considered required and meet the CIL Regulations 122 test, in that it would be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development

Obligations

- The extent and scope of the S278/ S38
- Contributions of £220 per residential unit for travel plan delivery and management or £5,693 where applicant will do their own delivery
- Contribution for road safety and sustainable transport improvements within 500m of the site £1,000 per unit. (£210,000)

Pre commencement conditions

B1B Approval of road works necessary

B38 Construction Management Plan – Major Developments

C. Pre occupation conditions

C7A Completion of Vehicular Access – Shown on Approved Plans

C8 Completion of Pedestrians/Cyclists Access – Shown

C35 Car Club

C36 Electric Vehicle Charging Points

File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments\TDM

Comments.docx22/02737.F Bristol Zoo

TDM Assessment details

The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.

Officers have reviewed this application and identified the following areas for detailed comments:

- Road network - Access and Road Safety – The safe movement of all modes entering and exiting the public highway
- Trip Generation –The existing and proposed trips related to the site
- Active Transport – Walking and cycling and behaviour change
- Public Transport – Current access and future potential
- Servicing and Delivery – How the development will manage the vehicular trips required
- Car Parking - How the development will manage the vehicular trips required

Location

The site is bounded by the BZG North Car Park to the north west (with the A4176 Clifton Down beyond), Northcote Road to the north east, Guthrie Road to the south east, and College Road to the south west.

Constraints

- The BZG North Car Park on land controlled by the Downs Committee to the north west. The Downs Committee made clear that they would not support any motorised vehicle access to the proposed development that would impact on the existing layout.
- Northcote Road is one way northbound

Road Network

Strategic

Page | 134

The strategic route for motorised vehicles access connects:

- A4176 Clifton Down from the A4 Portway around 1km to the south west to the A4018, 1km to the north east. The A4018 continues north to the M5 junction 17 around 7km north of the site. To the south the A4018 continues into Bristol city centre around 2.5km to the south.
- A4176 signal junction with the A4 Portway some 1km to the south west of the site, the A4 continues north for some 8km to Avonmouth and the M5 junction 18A and south east some 3km into Bristol city centre.

#### Local Roads

- Northcote Road is a one way road northbound along the eastern boundary of BZG. continues north east to meet The Avenue at a priority junction immediately east of the BZG North Car Park. The Avenue meets Clifton Down 20m further north at a priority junction. To the south The Avenue continues approximately 290m to meet Guthrie Road at a priority junction.
- College Road bounds the site from junction with the A4176 Clifton Down to junction with Guthrie Road at a priority junction immediately north west of the site.. College Road also has a junction with Cecil Road junctions some 160m and 250 south east of Clifton Down respectively Raised tables are provided at both junctions. A right turn lane is provided on Clifton Down for around three cars to be able to wait to turn right into College Road
- Guthrie Road forms the southern boundary from junction with College Road, to junction with Northcote Road 180m east of College Road. Guthrie Road continues north east to Pembroke Road a further 170m north east. There are traffic calming measures - road narrowings and raised tables.

#### Speed Limit

A 30mph speed limit is in place on the A4176 Clifton Down, with 20mph speed limits in place on College Road, Guthrie Road, Northcote Road, and other streets to the south, east, and west of the site.

#### Road Traffic casualty assessment

The TS showed evidence covering a five year period January 2016 to December 2020 inclusive. Roads included in the review are the A4176 from Ladies Mile/Clifton Down junction to Pembroke Road, College Road from A4176 to Guthrie Road, and the full length of Guthrie Road and Northcote Road.

- One slight accident occurred at the College Road junction with the A4176 Clifton Down to the north of the site with a car on College Road overshooting the junction and into the path of a vehicle travelling south west bound on the A4176.
- One slight accident occurred on the A4174 at the BZG car park exit where a vehicle leaving the car park hit a pedestrian walking along the footway on the A4174.
- Two slight accidents occurred at the A4176 junction with Ladies Mile and Clifton Down triangle some 150m to the west of the site,
- One slight accident was recorded on Guthrie Road, between the Northcote Road and The Avenue junctions.
- Three slight accidents, occurred at the A4174 junction with Pembroke Road.

#### Proposed changes to the public highway

The changes to the public highway will be subject to the S278 works which will include but are not restricted to the following:

- Extension to the raise table at the College Road/Cecil Road junction to include the proposed site access;
- Kerb build out at the northern end of Northcote Road to allow for the vehicle access and pedestrian crossing;

- Kerb build out at the southern end of Northcote Road to allow for pedestrian access and crossing.

#### Road Safety

The College buildings are spread across an area that is intersected by six different roads. The pupils range from nursery to 18 and the pupils in the senior school have to move around the local public highway network to those various buildings. Therefore road safety is paramount.

The road network around the college has been subject to a series of safer routes to school measures and there are parking controls operating in the area to enforce the kerbside. The new development will not be eligible to apply for parking permits.

The trip generation for the site is significantly reduced from the existing use.

All the works impacting on the highway have had initial safety reviews and will be subject to further safety audits as the scheme progresses. This process is linked to the S106 obligation for the developer to enter into a section 278 agreement.

The construction period would likely have heavier freight movement and that is why there is a condition attached for the detailed version of the CEMP. We can ensure that Clifton College are consulted by the applicant before the submit the document for discharge and as neighbours to the site they will be able to see and respond the application to discharge that condition. Time controls on peak school time can be applied at that time.

File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments\TDM Comments.docx22/02737.F Bristol Zoo

TDM also think it reasonable to allocate some of the travel plan contribution to road safety education for Clifton college to enable pedestrian and cycle training to take into account the changes on the public highway.

The S278 works can also be used to enhance any of the existing school safety infrastructure on the surrounding highway identified in the safety audits when the developer goes into contract prior to commencement.

It is therefore TDM's position that supporting the proposal subject to the obligations and conditions requested would enable all road safety concerns raised to be addressed.

#### Active Transport

##### Walking

The site is surrounded by prestige walking routes that access public transport, retail and leisure. A recent active travel survey was undertaken on 3rd March 2021. This identifies the good walking connections of the site but also sets out where the gaps are:

- Footways are provided adjacent to all roads in the vicinity of the site, with the exception of short sections on either side of College Road on the approach to the A4176 Clifton Down, on Northcote Road not along the perimeter wall of the BZG site on the western side of the road.
- A Puffin crossing is provided across the A4176 Clifton Down approximately 50m to the north east of the College Road junction. a footpath which continues across Clifton Downs to the north.
- On College Road a Zebra crossing is provided some 70m south of the junction with the A4176 Clifton Down.
- An uncontrolled pedestrian crossing with central island is also provided across College Road at the junction with Clifton Down.
- Tactile paving and dropped kerbs are provided at junctions to the south of the site, including the Guthrie Road junctions with College Road and Northcote Road.
- Three uncontrolled crossing points are provided on Guthrie Road with road narrowings, raised tables and tactile paving provided.

Example of the easy connectivity to retail;

- Alma Vale Road is some 600m to the east of the site with a mix of shops including the Clifton Mini Market convenience store, restaurants and cafes provided.
- The centre of Clifton Village is around 900m to the south of the site with a range of high end retail establishments, restaurants, and cafes. Co-op and Tesco Express convenience stores are also provided, along with a Post Office and pharmacy.
- Whiteladies Road is approximately 1km to the east of the site with a range of retail, restaurants and cafes provided.

#### Internal Layout

The provision of three vehicle access points and vehicle turning areas around the site aims to distribute vehicles around the site and minimise the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow vehicle speeds through the space and encourage free flow of pedestrian and cycle movement.

#### Cycling

There are no on-road or off-road cycle routes in the immediate vicinity of the site. However 135m from the western corner of the site a shared footway/cycleway is provided along the A4176 Bridge Valley Road, which in turn connects to the A4 Portway shared footway/cycleway some 1km to the west, providing a traffic free cycle route between Bristol city centre and Avonmouth.

File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments\TDM  
Comments.docx22/02737.F Bristol Zoo

#### Cycle Parking

A total of 380 secure resident cycle parking spaces are proposed for the apartments, with each cycle store containing sufficient parking to provide at least one cycle space per bedroom of the associated apartment building. 40 cycle spaces will be provided for visitors. This is an acceptable quantum.

#### Public Transport

##### Bus

Bus stops are located on the A4176 Clifton Down immediately north of BZG, with the southbound stop just north of the junction with College Road, and the northbound stop a further 40m to the north east. The bus stops are equipped with real time information, shelters and timetables. The southbound stop is served by bus services 8 and 505 and the northbound stop by bus service 505. There are 7 further

##### Train

Clifton Down train station is around 1km to the east of the site. Destinations served from this railway station include Bristol Temple Meads, Weston-Super-Mare and local stations of Redland, Montpellier, Lawrence Hill, Avonmouth and Severn Beach. Connecting services to destinations across the country are also provided from Bristol Temple Meads including London, Birmingham, Cardiff and Exeter and beyond. During the day Monday to Saturday services operate around every 30 minutes in both directions between Avonmouth and Bristol Temple Meads, continuing to/from Severn Beach and Weston-Super-Mare every hour. In the evening services operate every 30- 60 minutes from Temple Meads to Severn Beach. On Sunday an hourly service is provided between Bristol Temple Meads and Severn Beach.

#### Trip Generation

The Zoo generally attracted more Weekend vehicle than the weekday. Events are also more frequent on weekends.

The analysis looked a differentiating between staff and visitor trips the average week

Daily 24 Hour -  
Weekday BZG &

## Associated Uses

### Vehicle Traffic

#### Generation

Arrivals Departures Two-way

BZG Staff 81 81 162

BZG Visitors 288 288 576

Clifton Pavilion Visitors 129 129 258

Hide Visitors 94 94 188

Education Centre 33 33 66

Total 625 625 1250

### Car Parking

The area around the site forms part of the Bristol Residents' Parking Scheme (RPS). On a number of the roads within the vicinity of BZG including College Road, Cecil Road, and Guthrie Road many of the bays are shared permit holder and pay and display use bays. Vehicles can park either with a permit or for a maximum of five hours using the pay and display bays Monday to Friday 09.00-17.00. Immediately adjacent to the site on Cecil Road permit holder only bays are provided also operating Monday to Friday 09.00-17.00. No restrictions are in place in the evening and during weekends.

The results of on-street parking surveys undertaken on:

File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments\TDM

Comments.docx22/02737.F Bristol Zoo

Thursday 25th February 2021 at 20.0

Road	No. of Cars Parked	No. of Spaces Not Occupied
------	--------------------	----------------------------

College Road (Clifton Down to		
-------------------------------	--	--

Guthrie Road		
--------------	--	--

18	17	
----	----	--

Guthrie Road (full length)	30	23
----------------------------	----	----

Northcote Road (full length)	17	44
------------------------------	----	----

Total	65	84
-------	----	----

Wednesday 1st December 2021 at 20.00.

Road	No. of Cars Parked	No. of Spaces Not Occupied
------	--------------------	----------------------------

College Road (Clifton Down to		
-------------------------------	--	--

Guthrie Road		
--------------	--	--

32	52	
----	----	--

Guthrie Road (full length)	7	35
----------------------------	---	----

Northcote Road (full length)	17	9
------------------------------	----	---

Cecil Road (full length)	12	26
--------------------------	----	----

College Fields (full length)	23	28
------------------------------	----	----

Clifton Down triangle east (full length		
---	--	--

6	23	
---	----	--

Clifton Down triangle south		
-----------------------------	--	--

(full length)		
---------------	--	--

0	30	
---	----	--

Canynge Road (full length)	30	36
----------------------------	----	----

Total	127	239
-------	-----	-----

### Car Club

The application provides 1 car club and the provision of parking for this exact location to be linked

to S278 process with the possibility of it being an electric car club car, subject to being able to achieve a charging point on street.

Internal parking management

The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan will be required to detail how this will be managed.

Travel Planning

Construction Management

Advices

I021A) Alterations to Vehicular Access

I023A) Oversailing

I024A) Works on the Public Highway

I025A) Minor works on the Public Highway

I026A) Traffic Regulation Order (TRO) UPDATE TRO SPREADSHEET

I027A) Highway to be Adopted

I028A) Public Right of Way

I043A) Impact on the highway network during construction

I044A) Restriction of Parking Permits – Existing Controlled Parking Zone/Residents Parking Scheme

I045A) Restriction of Parking Permits – Future Controlled Parking Zone/Residents Parking Scheme

I046A) New driveway in a Residents Parking Scheme or a Proposed Parking Scheme

I052) Highway Condition Survey

File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments\TDM

Comments.docx22/02737.F Bristol Zoo

I053) Excavation Works on the Adopted Highway

I054) Private Road

I055) Street Name and Numbering

I056) Stopping Up/Diversion of Adopted Highway

I057) Stopping or Diverting a Public Right Of Way

I058) Sustainable Drainage System (SUDS)

### Transport Development Management 3 of 3

Date: 29<sup>th</sup> March 2023

TDM Summary

The information provided by the applicant is sufficient to secure support from TDM subject to obligations and conditions

TDM support the application because:

- The proposed development is consistent with national and local transport policy.
- The location of the site is accessible to pedestrians, cyclists, and public transport users.
- Site permeability to pedestrians also integrates the site with the surrounding pedestrian routes.
- Access to services, education and employment areas are within walking and cycling distance of the site, which is in line with local and national policies
- Satisfactory vehicular access can be achieved from College Road, Guthrie Road and Northcote Road. The provision of three vehicle access points distributes vehicles both around the site and local road network to minimise traffic impact. The details of which will be subject to S278 agreement.

Page | 139

- The internal site layout is able cater for all road users including service vehicles as shown by swept path analysis.
- The level of car parking proposed is suitable for the location of the site given that local facilities are accessible by foot, cycle, and public transport, and that on-street parking is controlled by a residents parking zone for which new residents would not be able to purchase permits.
- The sustainable travel measures proposed including secure cycle parking in excess of the minimum standards, car club car, and the implementation of a Travel Plan at the site further would encourage the use of alternative modes of transport to the private car, reducing car parking demand.
- Comparing average traffic generation, the proposed traffic generation of the development would be less than the existing BZG traffic generation therefore there is a net traffic benefit of the scheme compared to the existing use of the site. This would also be the case when considering the cumulative impact of both the residential schemes at West Car Park and BZG.
- The proposed scheme would generate substantially lower levels of traffic than from the BZG use on peak BZG visitor days.
- There are no road safety concern on the local road network and there is no reason to suggest that that proposal would affect this situation.

The obligations and conditions

The obligations requested are considered required and meet the CIL Regulations 122 test, in that it would be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development

Obligations

- The extent and scope of the S278/ S38
- Contributions of £220 per residential unit for travel plan delivery and management or £5,693 where applicant will do their own delivery

Pre commencement conditions

B1B Approval of road works necessary

B38 Construction Management Plan – Major Developments

C. Pre occupation conditions

C7A Completion of Vehicular Access – Shown on Approved Plans

C8 Completion of Pedestrians/Cyclists Access – Shown

C35 Car Club

C36 Electric Vehicle Charging Points

TDM Assessment details

The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.

Officers have reviewed this application and identified the following areas for detailed comments:

- Road network - Access and Road Safety – The safe movement of all modes entering and exiting the public highway
- Trip Generation –The existing and proposed trips related to the site
- Active Transport – Walking and cycling and behaviour change
- Public Transport – Current access and future potential



- Servicing and Delivery – How the development will manage the vehicular trips required
- Car Parking - How the development will manage the vehicular trips required

#### Location

The site is bounded by the BZG North Car Park to the north west (with the A4176 Clifton Down beyond), Northcote Road to the north east, Guthrie Road to the south east, and College Road to the south west.

#### Constraints

- The BZG North Car Park on land controlled by the Downs Committee to the north west. The Downs Committee made clear that they would not support any motorised vehicle access to the proposed development that would impact on the existing layout.
- Northcote Road is one way northbound

#### Road Network

##### Strategic

The strategic route for motorised vehicles access connects:

- A4176 Clifton Down from the A4 Portway around 1km to the south west to the A4018, 1km to the north east. The A4018 continues north to the M5 junction 17 around 7km north of the site. To the south the A4018 continues into Bristol city centre around 2.5km to the south.
- A4176 signal junction with the A4 Portway some 1km to the south west of the site, the A4 continues north for some 8km to Avonmouth and the M5 junction 18A and south east some 3km into Bristol city centre.

#### Local Roads

- Northcote Road is a one way road northbound along the eastern boundary of BZG. continues north east to meet The Avenue at a priority junction immediately east of the BZG North Car Park. The Avenue meets Clifton Down 20m further north at a priority junction. To the south The Avenue continues approximately 290m to meet Guthrie Road at a priority junction.
- College Road bounds the site from junction with the A4176 Clifton Down to junction with Guthrie Road at a priority junction immediately north west of the site.. College Road also has a junction with Cecil Road junctions some 160m and 250 south east of Clifton Down respectively Raised tables are provided at both junctions. A right turn lane is provided on Clifton Down for around three cars to be able to wait to turn right into College Road
- Guthrie Road forms the southern boundary from junction with College Road, to junction with Northcote Road 180m east of College Road. Guthrie Road continues north east to Pembroke Road a further 170m north east. There are traffic calming measures - road narrowings and raised tables.

#### Speed Limit

A 30mph speed limit is in place on the A4176 Clifton Down, with 20mph speed limits in place on College Road, Guthrie Road, Northcote Road, and other streets to the south, east, and west of the site.

#### Road Traffic casualty assessment

The TS showed evidence covering a five year period January 2016 to December 2020 inclusive. Roads included in the review are the A4176 from Ladies Mile/Clifton Down junction to Pembroke Road, College Road from A4176 to Guthrie Road, and the full length of Guthrie Road and Northcote Road.

- One slight accident occurred at the College Road junction with the A4176 Clifton Down to the north of the site with a car on College Road overshooting the junction and into the path of a vehicle travelling south west bound on the A4176.
- One slight accident occurred on the A4174 at the BZG car park exit where a vehicle leaving the car park hit a pedestrian walking along the footway on the A4174.
- Two slight accidents occurred at the A4176 junction with Ladies Mile and Clifton Down triangle some 150m to the west of the site,
- One slight accident was recorded on Guthrie Road, between the Northcote Road and The Avenue junctions.
- Three slight accidents, occurred at the A4174 junction with Pembroke Road.

Proposed changes to the public highway

The changes to the public highway will be subject to the S278 works. The S278 extent of works To the rear of opposite footway on Northcote Road, Guthrie Road and College Road. From jct/w A4176 to far side of junctions with Guthrie Road, works covered by agreement could include:

- signalised junctions
- safety related works such as traffic calming,
- street lighting,
- drainage
- Street trees
- improved facilities for pedestrians and cyclist.
- Any changes to the traffic regulations
- Resurfacing, lines and signs

To ensure all road safety matters are addressed the developer will fund independent road safety audits throughout the S278 programme until certification.

Active Transport

Walking

The site is surrounded by prestige walking routes that access public transport, retail and leisure. A recent active travel survey was undertaken on 3rd March 2021. This identifies the good walking connections of the site but also sets out where the gaps are:

- Footways are provided adjacent to all roads in the vicinity of the site, with the exception of short sections on either side of College Road on the approach to the A4176 Clifton Down, on Northcote Road not along the perimeter wall of the BZG site on the western side of the road.
- A Puffin crossing is provided across the A4176 Clifton Down approximately 50m to the north east of the College Road junction. a footpath which continues across Clifton Downs to the north.
- On College Road a Zebra crossing is provided some 70m south of the junction with the A4176 Clifton Down.
- An uncontrolled pedestrian crossing with central island is also provided across College Road at the junction with Clifton Down.
- Tactile paving and dropped kerbs are provided at junctions to the south of the site, including the Guthrie Road junctions with College Road and Northcote Road.
- Three uncontrolled crossing points are provided on Guthrie Road with road narrowings, raised tables and tactile paving provided.

Example of the easy connectivity to retail;

- Alma Vale Road is some 600m to the east of the site with a mix of shops including the Clifton Mini Market convenience store, restaurants and cafes provided.
- The centre of Clifton Village is around 900m to the south of the site with a range of high end retail establishments, restaurants, and cafes. Co-op and Tesco Express convenience stores

are also provided, along with a Post Office and pharmacy.

- Whiteladies Road is approximately 1km to the east of the site with a range of retail, restaurants and cafes provided.

#### Internal Layout

The provision of three vehicle access points and vehicle turning areas around the site aims to distribute vehicles around the site and minimise the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow vehicle speeds through the space and encourage free flow of pedestrian and cycle movement.

#### Cycling

There are no on-road or off-road cycle routes in the immediate vicinity of the site. However 135m from the western corner of the site a shared footway/cycleway is provided along the A4176 Bridge Valley Road, which in turn connects to the A4 Portway shared footway/cycleway some 1km to the west, providing a traffic free cycle route between Bristol city centre and Avonmouth.

#### Cycle Parking

A total of 380 secure resident cycle parking spaces are proposed for the apartments, with each cycle store containing sufficient parking to provide at least one cycle space per bedroom of the associated apartment building. 40 cycle spaces will be provided for visitors. This is an acceptable quantum.

#### Public Transport

##### Bus

Bus stops are located on the A4176 Clifton Down immediately north of BZG, with the southbound stop just north of the junction with College Road, and the northbound stop a further 40m to the north east. The bus stops are equipped with real time information, shelters and timetables. The southbound stop is served by bus services 8 and 505 and the northbound stop by bus service 505. There are 7 further

##### Train

Clifton Down train station is around 1km to the east of the site. Destinations served from this railway station include Bristol Temple Meads, Weston-Super-Mare and local stations of Redland, Montpellier, Lawrence Hill, Avonmouth and Severn Beach. Connecting services to destinations across the country are also provided from Bristol Temple Meads including London, Birmingham, Cardiff and Exeter and beyond. During the day Monday to Saturday services operate around every 30 minutes in both directions between Avonmouth and Bristol Temple Meads, continuing to/from Severn Beach and Weston-Super-Mare every hour. In the evening services operate every 30- 60 minutes from Temple Meads to Severn Beach. On Sunday an hourly service is provided between Bristol Temple Meads and Severn Beach.

#### Trip Generation

The Zoo generally attracted more Weekend vehicle than the weekday. Events are also more frequent on weekends.

The analysis looked a differentiating between staff and visitor trips the average week

#### Daily 24 Hour -

Weekday BZG &

Associated Uses

#### Vehicle Traffic

Arrivals Departures Two-way

#### Generation

BZG Staff 81 81 162

BZG Visitors 288 288 576

Clifton Pavilion Visitors 129 129 258

Hide Visitors 94 94 188

Education Centre 33 33 66

Total 625 625 1250

#### Car Parking

The area around the site forms part of the Bristol Residents' Parking Scheme (RPS). On a number of the roads within the vicinity of BZG including College Road, Cecil Road, and Guthrie Road many of the bays are shared permit holder and pay and display use bays. Vehicles can park either with a permit or for a maximum of five hours using the pay and display bays Monday to Friday 09.00-17.00. Immediately adjacent to the site on Cecil Road permit holder only bays are provided also operating Monday to Friday 09.00-17.00. No restrictions are in place in the evening and during weekends.

The results of on-street parking surveys undertaken on:

Thursday 25th February 2021 at 20.0

Road No. of Cars Parked No. of Spaces Not Occupied

College Road (Clifton Down to

Guthrie Road

18 17

Guthrie Road (full length) 30 23

Northcote Road (full length) 17 44

Total 65 84

Wednesday 1st December 2021 at 20.00.

Road No. of Cars Parked No. of Spaces Not Occupied

College Road (Clifton Down to

Guthrie Road

32 52

Guthrie Road (full length) 7 35

Northcote Road (full length) 17 9

Cecil Road (full length) 12 26

College Fields (full length) 23 28

Clifton Down triangle east (full length

6 23

Clifton Down triangle south (full length)

0 30

Canynge Road (full length) 30 36

Total 127 239

#### Car Club

The application provides 1 car club and the provision of parking for this exact location to be linked to S278 process with the possibility of it being an electric car club car, subject to being able to achieve a charging point on street.

#### Internal parking management

The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan will be required to detail how this will be managed.

#### Travel Planning

The obligation contribution will be prioritised for reducing car dependency and the road safety of

new residents and the relationship with Clifton College.

Construction Management

The construction management plan will be expected to demonstrate consideration of Clifton College when managing the construction trips related to the site.

C. Pre occupation conditions

C7A Completion of Vehicular Access – Shown on Approved Plans

C8 Completion of Pedestrians/Cyclists Access – Shown

C35 Car Club

C36 Electric Vehicle Charging Points

Advices

I021A) Alterations to Vehicular Access

I023A) Oversailing

I024A) Works on the Public Highway

I025A) Minor works on the Public Highway

I026A) Traffic Regulation Order (TRO)

I027A) Highway to be Adopted

I028A) Public Right of Way

I043A) Impact on the highway network during construction

I044A) Restriction of Parking Permits – Existing Controlled Parking Zone/Residents Parking Scheme

I045A) Restriction of Parking Permits – Future Controlled Parking Zone/Residents Parking Scheme

I046A) New driveway in a Residents Parking Scheme or a Proposed Parking Scheme

I052) Highway Condition Survey

I053) Excavation Works on the Adopted Highway

I054) Private Road

I055) Street Name and Numbering

I056) Stopping Up/Diversion of Adopted Highway

I057) Stopping or Diverting a Public Right Of Way

I058) Sustainable Drainage System (SUDS)

TDM Response to transport related objections from consultees of the most recent consultation.

Re: Historic England

The evidence provided by the applicant shows the trips to the site will be significantly lower than when it was as a zoo. (this is in comparison between servicing and delivery trips related to the Zoo site in operation against the proposed residential site not including the offsite visitor carparking).

They are also contributing S106 for travel planning will be used to promote safer and sustainable travel by the future residents to discourage private car ownership.

All of the changes impacting the highway will be subject to safety audits and adjustments will be able to be made within the S278 works.

Officers therefore are satisfied any concerns can be satisfactorily mitigated for.

Clifton College

TDM officers have reviewed the concerns of Clifton College using the information provided by the objector and are of an opinion that it is not sufficient to be deemed severe and therefore unlikely to sustain an objection.

The internal streets have been designed to provide a liveable neighbourhood taking into account the needs of pedestrians and disabled users moving around the site.

The provision of three vehicle access points and vehicle turning areas around the site minimises the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow vehicle speeds through the space and encourage free flow of pedestrian and cycle movement. The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan will be required to detail how this will be managed.

To mitigate for the any road safety concerns for the new site the applicant will be contributing All of the changes impacting the highway will be subject to safety audits and adjustments will be able to be made within the S278 works.

TDM officers have worked through a series of options for mitigating any road safety implications with the developer and the proposal thqat they can be reasonably addressed within the Section S278 process because the extent of S278 boundary works plan includes an area that would be deemed appropriate. The developer will enter into a Section 278 agreement prior to commencement which will include the formalisation of the extent of S278 works development on the existing road network identified in plan ref X

(A redline plan S278 extent of works To the rear of opposite footway on Northcote Road, Guthrie Road and

College Road. From jct/w A4176 to far side of junctions with Guthrie Road.)

works covered by agreement could include:

- signalised junctions
- safety related works such as traffic calming,
- street lighting,
- drainage
- Street trees
- improved facilities for pedestrians and cyclist.
- Any changes to the traffic regulations
- Resurfacing, lines and signs

To ensure all road safety matters are addressed the developer will fund independent road safety audits throughout the S278 programme until certification.

Officers therefore are satisfied any concerns can be satisfactorily mitigated

Twentieth Century Society

Date: 5<sup>th</sup> August 2022

05 August 2022

Dear Case Officer

Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA

The Twentieth Century Society has been notified of the above application for 'Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure.' There are a number of designated and non-designated heritage assets on the site and it is located within the Clifton and Hotwells Conservation Area.

Site

Page | 146

Bristol Zoological Gardens was founded by The Bristol, Clifton, and West of England Zoological Society and opened in 1836. Much of the heritage, built and landscaped, on the site dates from the 19th century and we defer to the Victorian Society for comment on the impact the proposed scheme would have on this work.

Of interest to the Society is the work carried out from the early 20th century, particularly the Monkey Temple (1928), the Clifton Pavilion (1930), the Clock Tower Building (Hide Restaurant/Bug World) (1938-), the Birds of Prey Aviary (1962), and the Terrace Theatre (2003).

#### Policy

The Monkey Temple and Birds of Prey Aviary were designated Grade II in 2022. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority [...] 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.” The zoo is also located within the Clifton and Hotwells Conservation Area. Section 72 requests that local authorities pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework (NPPF, 2021) includes paragraph 199 which states that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation [...] This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” Paragraph 200 states that any harm to, or loss of, significance should require clear and convincing justification. –

The Clifton Pavilion is locally listed and the Clock Tower Building and Terrace Theatre are unlisted but should be treated as non-designated heritage assets on account of their architectural and historic interest. The NPPF states that local authorities should take into account desirability of conserving heritage assets and putting them to viable uses consistent with their conservation for the benefit of communities (paragraphs 189 and 197). Paragraph 203 asks local authorities to consider the effect of an application on the significance of NDHAs.

#### Proposals

The Bristol, Clifton & West of England Zoological Society has announced that the zoo will close from September 2022 and the site adapted and developed for residential use with a ‘Clifton Conservation Hub’ for educational use. We understand that the zoo intends to sell the site with consent in place for the scheme. Our assessment responds to the proposals in their current form, as presented in the submitted documents.

#### Our Assessment

The Society has no objections to the majority of the work proposed to the 20th-century buildings and enclosures on the site. We do not take issue with the proposed reuse of the Grade II Birds of Prey Aviary as a seating area, and we support plans to restore the Grade II Monkey Temple as a garden folly. We are pleased that the Terrace Theatre (2003) will be retained as a community facility. When we first reviewed the application, we were concerned about the proposed two-storey zinc tile-clad rooftop extension to the 1930s Clock Tower Building which we felt would have a detrimental impact on the building. The architects have now revised and improved the design and, as such, we do not wish to comment on this aspect of the scheme.

We hope that these comments are of use to you. We would be grateful if you could please notify us of your decision on this application.

Yours sincerely,

Page | 147

Coco Whittaker  
Caseworker  
The Twentieth Century Society

## Urban Design Team

Date: 2<sup>nd</sup> March 2023

### Application: 22/02737/F & 22/02889/LA Bristol Zoological Gardens

#### Summary:

- Bristol Zoo is one of the earliest provincial zoos in the world and is consequently a highly significant heritage site.
- The relocation of the zoo to enable greater focus on its valuable conservation work is recognised.
- The proposals include heritage gains including improvements to the site boundaries and adaptive reuse of designated and non-designated heritage assets.
- However, the proposed new residential units within the site and the scale and massing of apartment blocks around the perimeter of the site lead to less than substantial harm (NPPF, paragraph 202) to the significance of the Clifton and Hotwells Conservation Area and setting of listed buildings within and around the site.
- Clear and convincing justification for any harm to the significance of heritage assets is required in accordance with **paragraph 200 of the NPPF**. The applicant has stated that the level of harm caused by the scale, massing and general quantum of the proposed development is required to ensure the delivery of the heritage gains and public benefits of the scheme.
- Revised plans and documents were submitted in late October/early November 2022, the Planning Statement and Design and Access Statement explains the key changes made. These comments respond to those submissions. A Vu.City model has also been provided, any views that have been relied upon when making these comments are included within the document.

#### Heritage assessment:

The site and its contents are subject to a number of local and national designations with regard to historical and cultural significance, including:

- Local Historic Park and Garden – the site
- Clifton and Hotwells Conservation Area (within)
- The Downs Conservation Area (immediately to the north)
- Listed buildings:
  - Bristol Zoological Gardens entrance (Grade II), north west corner of site
  - Giraffe House (Grade II), south eastern side
  - South entrance gates and flanking walls, Gurthrie Road
  - Clifton College, various Grade II and Grade II\* listed buildings (to the south)
  - Bear Pit (Grade II), within the site
  - Monkey Temple (Grade II), within the site
  - Eagle Aviary (Grade II), within the site
- Locally listed building:
  - The Clifton Pavilion (west side of site, facing College Road)



- Clifton Music School (southern tip at junction of College Road and Guthrie Road)
- Clifton College Preparatory School (north east)
- Houses on Clifton Down (to the west)

### **Significance (NPPF, paragraph 194/5)**

Bristol Zoological Gardens opened in 1836 and is predated only by Paris, London and Dublin zoos. Features from the original design of the zoo survive including the entrance lodges (listed grade II), the former bear pit (listed grade II) and terrace promenade.

Later features of the zoo landscape are also surviving nationally important heritage assets such as the former giraffe house (listed grade II), monkey temple (listed grade II), Guthrie Road entrance gates (listed grade II) and eagle aviary (listed grade II).

The zoo and its landscape make a positive contribution to the character and appearance of the Clifton and Hotwells Conservation Area, it is a locally designated historic park and garden and contains the locally listed Clifton Pavilion. The zoological gardens have been an important cultural asset for the city for nearly 200 years with multiple generations enjoying visits to both the animals and high-quality planted landscape. Consequently, the site has immense communal value in addition to the demonstrable architectural, aesthetic and historic values.

This significance is recognised by the applicant in their heritage assessment and has informed aspects of the proposals such as the reuse of the entrance lodges, bear pit, monkey temple, eagle aviary, Clifton Pavilion.

### **Assessment of impact (NPPF, paragraphs 199-204):**

The relocation of the zoo poses many challenges particularly where there are so many important aspects to the site as summarised above. The proposal offers opportunities particularly where the practical necessities of running a zoological garden in a residential neighbourhood have led to parts of the site making a neutral or negative contribution to the character and appearance of the conservation area.

The boundaries to the site, particular along Northcote Road on the east side of the site and in the middle section of the College Road boundary are proposed to be improved through this development offering an enhancement to these aspects of the conservation area.

The retention and reuse of numerous assets within the site; entrance lodges, bearpit, monkey temple, eagle aviary, giraffe house, Clifton Pavilion and the approach to the listed Guthrie Road entrance are welcomed as heritage gains. Similarly, the free public access proposed to the gardens between the hours of 8am and 5pm represents a heritage benefit, given it will increase public interaction with a number of heritage assets within the site.

Despite these gains the proposals will cause a degree of less than substantial harm to the character and appearance of the conservation area and setting of heritage assets within and around the site.

This harm will be caused by the scale and massing of the perimeter residential blocks and the introduction of residential dwellings within the historic landscape.

This part of the Clifton and Hotwells Conservation Area is predominantly characterised by large Victorian residential villas that front Clifton and Durdham Downs and surrounding streets as recognised by Panoramic View 21 in the Character Appraisal. The type of large residential apartment blocks proposed

for the zoo (as demonstrated in view 1 of the appendices) will consequently differ from this character and not preserve or enhance the character and appearance of the conservation area as required by the Act (Town and Country Planning (Listed Buildings and Conservation Areas) Act, 1990).

The block on the northern boundary also harms the setting of the listed entrance lodges as demonstrated in view 2 of the appendices where the current significance of the entrance lodges includes their visual dominance in the landscape despite their low architectural form.

The applicant has introduced some design changes to the scheme in light of previous comments. These have helped reduce the impact, however, introducing greater void (windows) to solid (wall) ratios and/or greater (deeper) recesses in the areas of the circulation cores particularly with the block on the northern boundary would help to break down the massing and create a more villa type appearance thereby reducing the level of harm.

The scale and massing of the other blocks around the site also causes less than substantial harm to the character and appearance of the conservation area and setting of listed buildings such as the listed Clifton College buildings on Guthrie Road as demonstrated in views at the junction of Northcote Road looking towards College Road (Local Views 26, Character Appraisal and view 3 of the appendices).

The impact on the setting of the Clifton College heritage assets is reduced in views from the south, such as from the cricket pitch, where only a slight if any impact is visible in views such as view 4 of the appendices (Long View 25, Character Appraisal).

The proposed 'lake house' villas within the zoo landscape are architecturally interesting buildings that complement the design aesthetic of the retained zoo buildings. However, by introducing private residential dwellings to what is currently a quality landscape that is perceived as public will cause cumulative harm to the conservation area and local historic park and garden. This harm will be caused by the introduction of vehicular movement and car parking to what is currently a largely vehicle free landscape. These private dwellings and their associated aspects will change the perception from being a public to a private landscape impacting the communal value of the site as well as the landscape qualities. This will be particularly evident when looking into the site from College Road (view 5 of the appendices, also identified as Local View 21 in the Character Appraisal) where the landscape will appear to be a private residential street as opposed to a public historic landscape.

The proposed northern block will not materially harm the significance of the Downs Conservation Area due to the topography of Downs and the screening provided by the existing trees.

#### **Urban Design:**

The height, scale and massing of the development has been assessed in relation to heritage assets and the character of the area, the harm associated with this has been discussed contrary to policy DM26 and 27. The layout directs the majority of the development to the site's edges reinforcing the 'walled' character of the site. With regard to policy DM28, the development will create a safe, attractive, high quality, inclusive and eligible public realm, both within and outside of the site. As distinct new part of Clifton, the new buildings as proposed will introduce high quality materials to the townscape in accordance with policy DM29.

#### **Conclusion:**

Clear and convincing justification for any harm to the significance of heritage assets is required in accordance with **paragraph 200 of the NPPF**. The applicant has stated that the level of harm caused by the scale, massing and general quantum of the proposed development is required to ensure the delivery

of the heritage gains and public benefits of the scheme. These heritage gains include the retention and reuse of the various heritage assets (designated and non-designated) and enhancement to aspects of the conservation area as detailed above.

Public benefits provided by this scheme that can contribute to the planning balance as defined by **paragraph 202 of the NPPF** include; free public access to the gardens and a cultural strategy that will encourage greater community use of the assets. Planning conditions and agreements will be required to secure these benefits should this proposed development receive consent.

Archaeological conditions to secure the recording of the heritage assets prior to and during the development works will also be required in accordance with **paragraph 205 of the NPPF and Supplementary Planning Document 7**. This should include the pre-commencement condition to secure an archaeological programme of works and historic building recording and watching brief conditions.

View 1

Page 324



View 2

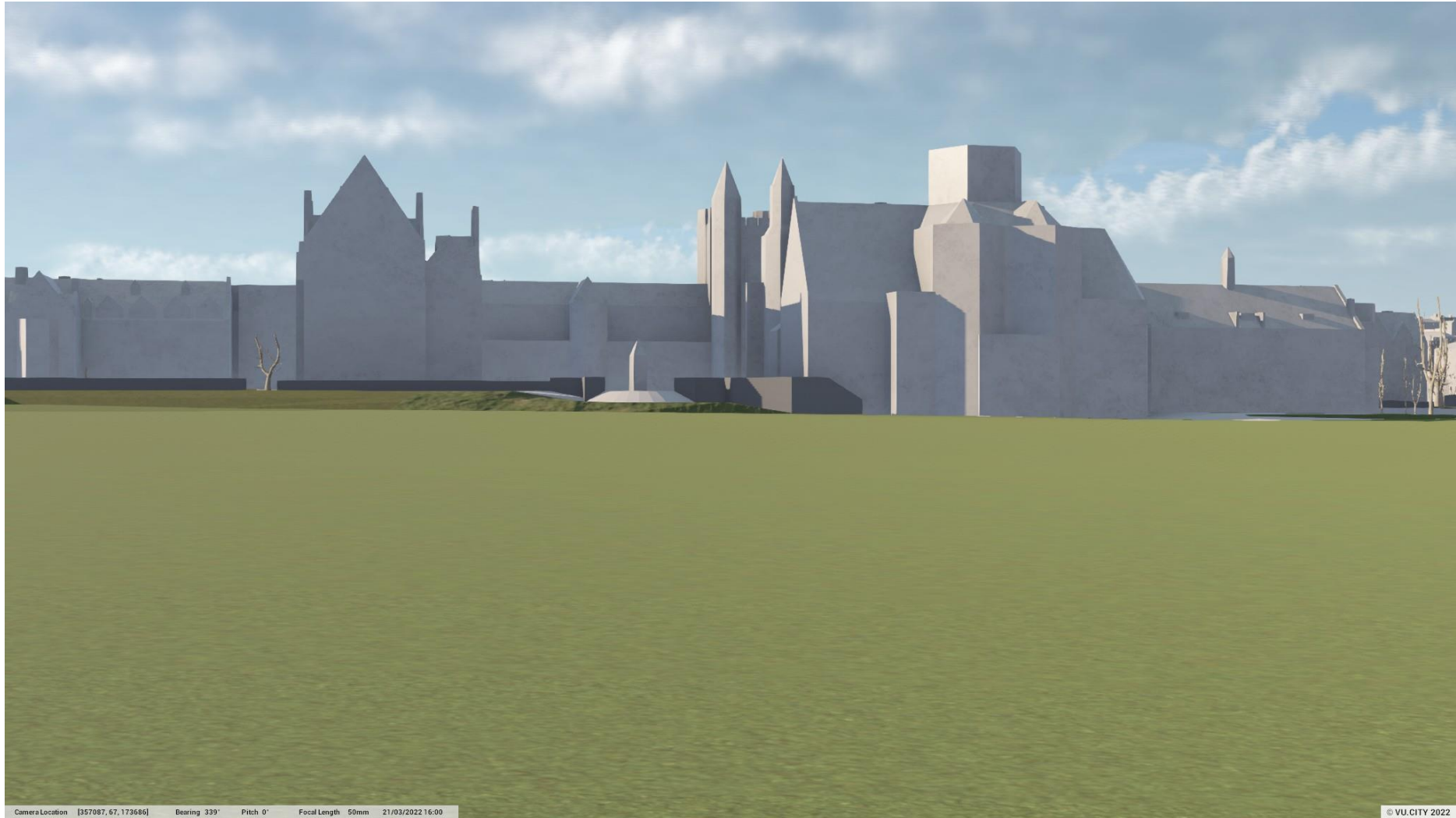


View 3

Page 326



View 4



Page 327

Camera Location [357087, 67, 173686] Bearing 339° Pitch 0° Focal Length 50mm 21/03/2022 16:00

© VU.CITY 2022

View 5



Page 328



## Wessex Water

Date: 8<sup>th</sup> November 2022

I refer to your consultation in respect of the above and apologise for the delay in response. Please find attached an extract from our records showing the approximate location of our apparatus in the vicinity of the site. The following comments are made on behalf of Wessex Water:

New proposed foul water connections are shown on the below ground drainage layout plans. The majority of the flows are shown to connect to an existing foul water manhole on site connecting to the public foul water sewer at MH ST56739901 (Guthrie Road). This is assumed to be the previous main sewer connection from the operational site and is acceptable in principle (subject to application).

Other connections are proposed for Residential Block E1 within drawing 29730/6002 to sewer manhole ST56749001 in Northcote Road and Residential Block north of the Giraffe House to manhole ST56749012. This is acceptable in principle although further investigations will be required for the latter connection. According to our records manhole ST56749012 is on a recently discovered sewer with unknown downstream connectivity. Wessex Water will investigate downstream connectivity.

We note the on-site SuDs arrangements. The applicant is proposing an overflow connection from the lake to the existing public foul sewer in Northcote Road (Manhole ST57740002 ). Surface water connections to public foul sewers are not normally allowed and only considered where there are existing proven connections and no other method of disposal. If the surface water cannot be discharge to the surface water sewer to the north of the site and a connection to the existing public foul sewer is pursued we will require confirmation:

1. Of the drainage areas served by the Lake and the split between residential areas and highway.
2. That the Lake will not contain any groundwater or overland flows
3. Of the existing proven surface water connections to the public foul sewers
4. Of the predicted overflow use, flows and volumes.

The applicant may contact the undersigned to discuss further.

Kind Regards

Gillian Sanders

Planning Liaison Manager

Wessex Water

# Zoo Application Comments Summary

22/02737/F

## Appendix 2 - Neighbour Comments

DC Committee date 26<sup>th</sup> April 2023

### Notes:

- This document includes comments from neighbours and other members of the public. For comments from stakeholders such as statutory consultees, internal contributors, interest groups, and neighbour associations, please see Appendix 1 'Contributor Comments'.
- Some comments included within this document are duplicates, meaning this document exaggerates the number of comments received in response to this application. As explained within the Committee Report, in total, 475 objections and 59 support comments have been received (as of 17.04.2023).
- It has not been possible to include all figures, tables, or pictures included within the original comments within this document.

## **Index**

<b>First consultation phase .....</b>	
<b>15<sup>th</sup> June 2022 – 6<sup>th</sup> November 2022 .....</b>	<b>3</b>
<b>Second consultation phase .....</b>	
<b>7<sup>th</sup> November 2022 – 15<sup>th</sup> January 2023 .....</b>	<b>151</b>
<b>Third consultation phase .....</b>	
<b>16<sup>th</sup> January 2023 – 17<sup>th</sup> April 2023.....</b>	<b>271</b>

## First consultation phase

15<sup>th</sup> June 2022 – 6<sup>th</sup> November 2022

STANCE	COMMENTS	DATE RECEIVED
1. O	This space should be left purely as conservation and public area of nature - there is no logical reason to fill more of the overpopulated area of Clifton with inadequate housing.	15-Jun-22
2. S	I am writing in support of the proposed design for the Bristol Zoo Gardens development. Whilst it is progressive in addressing Bristol's need for housing, it is also in keeping with the Zoo's history, recognising and celebrating Bristol Zoo by presenting a proposal that is sensitive to the setting and site heritage. The proposal combines living space with a strong community offer. The proposed accessible gardens, café, and children's play area will help to ensure that the site remains a centre for the local community, continuing to provide a social focal point for the Clifton Downs area. In addition to the green space and play park, a proposed exhibition space for community activities presents a brilliant opportunity for local groups and charities such as We The Curious to engage with the wider community in a vibrant relevant setting, a valuable additional asset for many charities and community groups in the region. What better environment to talk about bio-diversity and climate related issues than nestled in the middle of one of Bristol's most important green spaces? The importance of these vital green spaces has also been considered by the designers, protecting the gardens and increasing biodiversity, with a 38% biodiversity net gain through the development, contributing to Bristol's action on the climate and ecological emergency. Finally the proposed plan will deliver 200 much needed eco-friendly homes to Bristol residents, in a thoughtfully designed and constructed environment.	15-Jun-22
3. S	I think this is great scheme. It successfully finds a way to keep the gardens open to the public, while providing housing we really need in Bristol. Clifton lacks affordable housing and to provide even a limited amount is critical. It will also allow the creation of a new zoo and for Bristol to be at the forefront of zoo design and conservation in zoos. Zoos must evolve. They must innovate to address the global ecological emergency, especially the decline of species and destruction of their habits. Bristol will and should lead this work.	16-Jun-22
4. S	I'm very much in favour of the redevelopment of Bristol Zoo Gardens and feel the land can be put to very good use. Having more homes, including affordable homes, in the heart of Clifton can only be a positive thing for our city. Now that the zoo is relocating I'm pleased to see there will still be open space and accessible community landscape for local people to enjoy.	16-Jun-22

5. S	The scheme proposed by the Society should be seen as an exemplar of how modern developments can balance the need for quality housing, conservation and community. The development will provide essential modern new homes, a new accessible community space for all of Bristol, and a hub of conservation and biodiversity. This will engage new audiences from across the city through cultural arts activities and wildlife engagement providing access for all for the first time in the sites history. The design creates a space for all of Bristol to enjoy while maintaining the heritage and remembering the history of the site and should be supported in its entirety	16-Jun-22
6. S	These proposals appear to have been well thought out and represent a positive future for a site that Bristol Zoo are clearly unable to continue running. As a local resident I completely back the opening of the site to free public access and fully support the creation of badly needed new homes for Bristol. I am also extremely impressed by the way in which the Zoo have handled themselves throughout this process and have full confidence in their ability to deliver the scheme as proposed.	16-Jun-22
7. S	The Zoo needs more space and has decided to move outside the city. It will maintain control of the redevelopment of its historic site; retain a presence there and offer the public access to its gardens. The housing development around the walled edges will be on mostly already developed land. Whilst it might have been good to maintain all as it was, this must be as good and as responsible a compromise as it is possible to make. I hope that this application is approved.	16-Jun-22
8. S	I support fully Bristol Zoological Society's plans. These are carefully thought-through and respond well to the needs of society in the 21st century - a century in which the global challenges of biodiversity loss and climate change will affect every person on the planet. Their plans to provide free public access, in an historic and sensitive site, with the aim of world-class public engagement are excellent and admirable. I wish them every success.	16-Jun-22
9. S	The world has changed. This proposal wins on many fronts, but two are important. 1. The zoo needs to move on and is trying to do better. 2. This is a great opportunity to achieve a very rare thing: new homes in Clifton. This never happens. Let's support a move towards sustainable development and animal welfare. This application is to be commended.	17-Jun-22

10. S	<p>I am writing as Chair of Trustees of Bristol Zoological Society to support our planning application for the development of the Bristol Zoo Gardens site. I know that we have taken time as Trustees to carefully and thoroughly think through the best way to preserve the architectural heritage and natural heritage of the site, supported by our management team and professional advisers. We are delighted that our proposals enable free access to our beautiful gardens for the general public, as well as contributing much needed housing for Bristol. We will be increasing biodiversity on site by 38% through our sustainable housing design and landscaping. And the sale of the site will support our future, at the new Bristol Zoo site at Wild Place, where our animals, reptiles and birds will be living in habitats which more closely reflect their natural environment and from where we will continue our Bristol based, national and international field conservation programmes.</p>	17-Jun-22
11. S	<p>I am a Trustee of Bristol Zoological Society and I am also a near neighbour. This scheme has been carefully thought out and I strongly support it. I am particularly pleased that there are included a good number of flats. Smaller sized accommodation in this area is in very short supply. This results in a situation where older people continue to live in very large houses because understandably they don't want to leave the area they have lived in for a long time. There is consequently a shortage of larger housing for younger families. This scheme therefore addresses a specific social need - as well as the general need for more housing in Bristol. The proposed repurposing of the iconic entrance building will be a great asset to the local community (and to Bristol generally). I am also very pleased that there will be free public access to the gardens (not currently the case) and that environmental concerns have been addressed so sensitively. This will be big step towards the development of a new Bristol Zoo where animals will be housed in a manner more closely representing their natural environment and around 80% of species will be of conservation concern.</p>	17-Jun-22
12. S	<p>As a local resident I support these plans wholeheartedly. The proposed new sustainable housing is sorely needed in the local area, which is currently witnessing a housing shortage crisis. This is especially the case for young families that want to stay in the area but need a larger space. This will also help free up smaller flats and houses for first-time buyers. 20% of these new homes will also be affordable housing. The amount of homes proposed is not excessive for the local area. There are enough schools, accessible roads, and community assets nearby to facilitate the minor increase in residents locally. The proposed development would be in keeping with the local community and surroundings, and would fit naturally into the existing space. The public park will be of great benefit to the local community, providing a much needed green space with facilities for people who may otherwise find the Clifton Downs inaccessible. The proposed conservation Hub is also essential to support the work of the Avon Gorge and Downs Wildlife Project. I have every confidence that this will be a real community asset.</p>	17-Jun-22

13. S	<p>This is a well-conceived redevelopment of the site of the current Zoo, which will provide a welcome new public space in the retained gardens. The gardens will be of social and environmental benefit, with a children's playground and new planting. The proposed housing is welcome given the pressure on accommodation in the city. The plan to ensure that 20% will be affordable, 75% social rent and 25% first homes is commendable and supports the city's commitment to increasing the stock of affordable housing. In addition, the redevelopment of the site will enable the creation of a new Bristol Zoo at Wild Place that will play an important role in fostering conservation work and providing new skills by educating the next generation of conservationists. This aligns well with the city's commitment to addressing the ecological emergency.</p>	17-Jun-22
14. S	<p>As a member of the Bristol Zoological Society staff team, and passionate about Bristol, I support this application. It can secure a future for the conservation charity as well as a legacy for the gardens of which we can be proud. The key reasons for my support are as follows: - The application provides free, public access to the gardens, with a new café, exhibition space, a children's play area, and use of the Terrace Theatre for community, cultural and educational activities - It enables the protection of the Gardens and historic buildings such as the Monkey Temple, with a 38% biodiversity net gain - 201 high-quality, eco-friendly new homes will be built for Bristolians, including 20% which will be affordable Architects Penoyre &amp; Prasad have taken inspiration from the landscape and its history, to design an exciting and beautiful development with community at its heart. This will allow people from different generations and backgrounds to come together with wildlife in a truly wonderful space. It will enable the 186-year-old conservation charity to continue its work, by developing a world-leading zoo at its Wild Place Project and building on its important conservation work across four continents -- from forestation programmes in Madagascar to support endangered lemur populations to protecting western lowland gorillas in Equatorial Guinea.</p>	17-Jun-22

15. S	'As the former CEO of Destination Bristol I am very aware of the challenges the industry faces - and the need to continue to invest in attracting local, national and international visitors to Bristol and the wider Bristol region. I fully support this application. The Clifton site has been a wonderful home to the zoo, but times change, and we need to change too. The proposals to invest in the New Bristol Zoo on the edge of the city where Wild Place Project already exists is the obvious way forward...creating a really wonderful conservation-focussed attraction that will continue to be part of what makes Bristol such a popular and attractive destination for visitors. It is fairly obvious the existing site is no longer suitable. But I think the Society's approach is sensitive, attractive and will leave a great legacy for the Society in Clifton. Opening the grounds as a beautiful park is a really welcome gesture and gift to the wider community. It was not my role to comment on the housing need in Bristol, but it is clear to everyone that more homes are needed across the whole city including in Clifton. I have publicly stated my support for the strategy the Society is taking - and that the alternative proposals for the Zoo Gardens should not distract from the important work the Society does in conservation and attracting tourism spending, one of the key economic drivers of this wonderful city. John Hirst Former CEO Destination Bristol ....2012 to 2021	18-Jun-22
16. S	I strongly support the initiative proposed by the Bristol Zoological Society. This transformation will secure free community access particularly important to connect with nature in urban spaces, will retain habitat for species within the city, create eco-sustainable homes, and enable the new Bristol Zoo. Martín Zordan CEO at the World Association of Zoos and Aquariums (WAZA)	20-Jun-22
17. S	I am writing to support the planning application for Bristol Zoo Gardens. As Director of Conservation and Science for Bristol Zoological Society and a Bristol resident, I believe the plans for developing the Bristol Zoo Gardens site greatly benefit Bristol. The housing plans will create a sympathetic and ecologically sustainable housing solution for the Clifton area and a valuable community asset.	20-Jun-22
18. S	Sounds like a sensible move.	21-Jun-22
19. S	It's fantastic that much-needed, quality homes will be built in Clifton and I'm delighted to hear that the historical gardens and lake will be preserved and made free for all to enjoy. I believe that the proposed new Café will also be great for families living in the area.	21-Jun-22
20. S	I think it's great that the legacy of Bristol Zoo in Clifton will live on in the presence of good quality, eco-friendly low-carbon homes, in a green space. Meanwhile, Bristol Zoo can continue to grow and expand for the better at the new site with an even greater focus on conservation.	21-Jun-22



21. S	Very impressed that the charity have been courageous to re-evaluate their assets considering the challenges of the future. This ambitious plan not only benefits the animals, conservation and educational value of moving to a new site but it also creates more quality housing and accessible community gardens, considering all aspects of sustainability. I am honoured to have recently joined the Bristol Zoological Society from Durrell Wildlife Conservation Trust in Jersey, as well as relocating to Bristol, I am excited to be part of this evolution into what a zoo can be and positively impact on the future wellbeing of our community and help save wildlife together.	21-Jun-22
22. S	As a Trustee and shareholder of Bristol Zoological Society I am fully supportive of this application. The application has the unanimous support of the Board of Trustees of the Society as the only viable option that will support the continued existence of the Society and its work in conservation at its new location at Cribbs Causeway, while providing much needed high quality housing, including affordable housing, in Clifton. In addition, I support this application for the following reasons: - Providing free, public access to the gardens in the daytime, with a new café, exhibition space for community activities, children's play area, and more - Protecting the Gardens and historic assets, with a 38% biodiversity net gain - Delivering approximately 200 high-quality, eco-friendly new homes for Bristolians - the sale of the Clifton site will support our future and help build a new Bristol Zoo at the Wild Place Project, where around 80 percent of species are linked to our conservation work, living in spaces more closely reflecting their natural habitats. - responds sensitively to the historic and natural environment	21-Jun-22
23. O	Find the swap from a world renowned zoo to what appears to be a tenement block of lego apartments rather baffling. It appears the planners are trying to pull the wool over our eyes with buzz words about 'other worldliness' and 'sustainability' however we all know this all boils down to greed and generating profits hiding under the guise of conservation..? The zoo should be modified because it is run down however the land could be used purely for recreational purposes and smaller animals rather than an ugly apartment block. The apartments are too many and way too high and do not benefit nor fit into the surrounding area, putting a giraffe into the brickwork honestly is the work of school children.. This needs a massive rethink and should be refused on the grounds of parking alone. Bristol deserves better than this.	22-Jun-22
24. O	Find the swap from a world renowned zoo to a tenement block of apartments disgusting.	22-Jun-22

25. O	Find the swap from a world renowned zoo to what appears to be a tenement block of lego apartments rather baffling. It appears the planners are trying to pull the wool over our eyes with buzz words about 'other worldliness' and 'sustainability' however we all know this all boils down to greed and generating profits hiding under the guise of conservation..? The zoo should be modified because it is run down however the land could be used purely for recreational purposes and smaller animals rather than an ugly apartment block. The apartments are too many and way too high and do not benefit nor fit into the surrounding area, putting a giraffe into the brickwork honestly is the work of school children.. This needs a massive rethink and should be refused on the grounds of parking alone. Bristol deserves better than this.	22-Jun-22
26. O	Find the swap from a world renowned zoo to a tenement block of apartments disgusting.	22-Jun-22
27. O	The objections raised so far are mostly not just NIMBY neighbours. Most people do not object in principle to the development of the zoo gardens to provide housing. Many of the local residents are not living in multimillion pound properties, but flats and apartments in sensitively converted older buildings, and some ( mostly compatible) modern multi occupancy buildings. It is in the interest of all people in Bristol , not just those fortunate enough to live in Clifton, to maintain an attractive environment, with open green space and well designed buildings. This development raises concerns about the density of residence, and the height of the residential buildings proposed. This is particularly an issue in Northcote Road and Guthrie Road. Three stories would be preferable to 5 and 6, and more compatible with the surrounding environment. The buildings along Clifton Down are more acceptable, as they will be set back behind the existing mature trees. We need to have a more spacious environment, less dwellings packed in to a small area, and less high rise dominating the development. As other commentators have stated, there must be a secure way of sustaining the gardens for public access with a high standard of maintenance guaranteed for the future.	23-Jun-22
28. O	The zoo has been very effective in public consultation and discussion at their series of meetings, and some of the suggestions and ideas expressed by local people have been taken into consideration. Overall the plan has shown some sensitivity to effects on the Clifton environment and the presentation of enhanced gardens with free public access is to be commended. I regret the fact that once again the zoo and Bristol City have decided to crowd as much accommodation into this space as possible, greatly increasing the density of population in this restricted area. The buildings, while having some sensitivity in design , are again taller than are suitable for this site. Four stories would create much less visual impact than the planned six.	23-Jun-22

29. O	<p>My original objection is pasted below and I see little in the revised planning proposals that counters any of the points previously made by me or other objectors. Savills have proffered a reduction in the number of residential units from 201 to 196 and a tacit acknowledgement that the space within its footprint would soon become ghettoised, necessitating the imposition of opening hours for the gardens. That does not translate into the returning of this part of our city's landscape to the people of Bristol. In short, the revisions comprise slightly fewer ugly boxes crowbarred into a wholly flawed concept. Original Objection: The developer's ability to put housing on this site obviously provides its motivation for pressing forward with this development and the funding to relocate the zoo. But the plans are wholly inadequate for several reasons: 1) Unhampered public access to this space which surrounded by high walls and the proposed housing will create an unsafe ghettoised space, especially after dark 2) The proposed new buildings are utilitarian, almost comedically Stalinesque, over-storeyed, and will self-evidently prove, if they are built, to be an utter eyesore talked about for years afterwards as the Clifton Carbuncle. What ever possessed the architects, planners or others to proffer such a build? 3) There is inadequate provision of social housing and first homes 4) The plan encourages car usage contrary to the sustainability policies put in place by Bristol City Council. 5) More imaginative schemes, even ones focused on creating a social/community space, and one that has a wider geographical, i.e., regional, draw would be infinitely preferable to this proposed plan. There is other less expensive derelict and unused land in the City that would be far more adequate and provide better affordable housing. The leaflet pushed through Clifton letterboxes recently is insulting. The implied choice to be made is a false one. One can support both good development and conservation action; one need not come at the expense of the other.</p>	24-Jun-22
-------	---	-----------

30. O	<p>The developer's ability to put housing on this site obviously provides its motivation for pressing forward with this development and the funding to relocate the zoo. But the plans are wholly inadequate for several reasons: 1) Unhampered public access to this space which surrounded by high walls and the proposed housing will create an unsafe ghettoised space, especially after dark 2) The proposed new buildings are utilitarian, almost comedically Stalinesque, over-storeyed, and will self-evidently prove, if they are built, to be an utter eyesore talked about for years afterwards as the Clifton Carbuncle. What ever possessed the architects, planners or others to proffer such a build? 3) There is inadequate provision of social housing and first homes 4) The plan encourages car usage contrary to the sustainability policies put in place by Bristol City Council. 5) More imaginative schemes, even ones focused on creating a social/community space, and one that has a wider geographical, i.e., regional, draw would be infinitely preferable to this proposed plan. There is other less expensive derelict and unused land in the City that would be far more adequate and provide better affordable housing. The leaflet pushed through Clifton letterboxes recently is insulting. The implied choice to be made is a false one. One can support both good development and conservation action; one need not come at the expense of the other.</p>	24-Jun-22
31. O	<p>The planned development of the Bristol Zoo facility is unacceptable: - no account is taken of the amenity value of the current working zoo to the people of Bristol ; especially to young families. Better efforts must be made to replace the current poorly-run Zoo business with a new, more-viable business, maybe including animatronic animals, climbing and zip-wires, children's play areas and upscale restaurants. - the planned density of housing is too much; no account is taken of the need to provide facilities (schools, doctors, dentists, road improvements, internet connections) for the increased population in this already-crowded area. - the proposed high-rise cube buildings are ugly in themselves and do not match the architecture of the surrounding conservation area. - the proposals to manage traffic and parking by the new residents by prohibiting parking permits are naive and do not take into account times when parking is currently free. - no details are given about how the proposed public spaces and lake will be maintained, nor how they will be paid for and kept free in the future.</p>	24-Jun-22
32. O	<p>I note that there is no guarantee of perpetual public access to the gardens. Indeed, access gates with keypads, such as are proposed for the pedestrian gate on the boundary alongside Clifton Down Road, are definitely not 'open access'. Whilst the site is currently gated, there is no reason for this to be perpetuated. To create a ghetto, albeit one with wealthy residents seems undesirable. The revised proposals do not address the concerns raised by myself among others to the original high density and physical height of the block of flats, N1 etc. . Amendments to the layout within the blocks are immaterial when the block itself is the problem.</p>	24-Jun-22

33. O	<p>Whilst it seems inevitable that the Zoo site will be used for building it is still important that the area be used for the benefit of as many and diverse individuals as possible. This includes access as an open space and housing provision for people of limited means or with disability. It seems sad that the committee in charge of housing development should be willing to accept a 20% provision of such accommodation in return for a guarantee of the work being commenced quickly (short term benefit) whereas the full 40% legal requirement would be of major long term benefit. The original much vaunted open access to the site and provision for its long term maintenance now seems at risk. The suggestion that ongoing costs of this should be borne by the residents ( apart from those in social housing) and this necessitates the maximum number of residents and the minimum of those in social housing is a spurious way of reducing the % of social housing. I would suggest that there should be a sum of money put in trust by the developers for the grounds maintenance from the outset.</p>	24-Jun-22
34. O	<p>The density of the proposed housing, in particular high rise Block N, is too great for the area. The character of Clifton Down Road is of individual buildings the majority of which were originally designed as single family dwellings although I accept that some are now subdivided into flats. A monolithic high structure would adversely impinge on the area and should be avoided. The existing boundary wall currently conceals the buildings within the zoo grounds, that should remain its purpose.</p>	24-Jun-22
35. O	<p>My original objections are unchanged by the revised proposals. The proposed development is in a Conservation Area The design of the houses is totally out of keeping with the Victorian houses in the neighbourhood and indeed most of Clifton. What's more they are high, much higher than most of the perimeter of the existing site so will stand out very prominently. I don't object to new houses being built but it is a Conservation Area and therefore the design should be in keeping with the surroundings and the heritage of Clifton.</p>	25-Jun-22
36. O	<p>Through the enormous mass of documents revising the plans, I couldn't see anything addressing the awful external nature of the proposed development. The proposals are still totally out of keeping with the visual appearance of the local area and would be a blot on the landscape. Any development must fit in with the rich architectural character of this part of Clifton - the proposals have total disregard for the fact this is a Conservation Area.</p>	25-Jun-22
37. O	<p>Received a letter from the Zoo and the pictures on the first page showing a park area all look great. I looked at the next page and see 6 story buildings are being proposed. 6 stories is far too high and out of keeping with the general nature of Clifton. Any new build should be no higher than the typical Victorian properties in Clifton and designed in a style far closer to the other Victorian buildings in the area - not modern high rise blocks of flats. These are visually out of character with Clifton.</p>	25-Jun-22

38. R	I approve in principal of the plans outlined in the leaflet. HOWEVER, why does the architecture have to be so ugly, boxy and brutalist? No amount of greenery can obscure that. The gardens are beautiful, very natural looking and free-flowing to move around, and these huge ugly boxes will not fit in at all; they will stand out like very sore thumbs indeed. Surely some gentler, softer, less grating design would be more suitable and pleasant. The photo looks like downtown Beirut rather than a lovely English garden!	25-Jun-22
39. S	This is a sensitive, eco-friendly design for modern accommodation which will fit into the surrounding built environment without being an imitation of it. The Zoological Society has, quite rightly, acknowledged it's responsibility to ensure the site is developed in the best possible way and managed carefully in the future. I wholeheartedly support this application.	25-Jun-22
40. S	I am pleased to support this well thought out application. It will provide much needed homes in a nice area. The community is well provided for in this scheme and the gardens are also looked after. On a wider perspective the disposal will funding which will enable animal conservation for endangered species to continue in a more appropriate setting at the Wild Place Project. Strongly supported.	25-Jun-22
41. S		26-Jun-22
42. O	I have previously commented on the plans to redevelop Bristol Zoo for residential purposes and whilst I was broadly supportive to these proposals, I was very disappointed with the unpleasant visual aspects of the proposed design. As a long-standing local resident is a matter of great concern that the unsightly eyesore which constitutes this design has not been significantly modified in the latest proposals. Indeed, it is hard to discern what changes have been made and good design cannot be replaced by the meaningless spin set out in the Design Guide. Therefore, I must continue to express my disgust at the unsympathetic nature of these proposals which are wholly out of keeping with the surrounding historic area. I must also emphasis that successful design does not stop at the site boundary but must produce a development which fits into the local environment comfortably. The current proposals fail on these grounds and so should not be allowed to proceed unmodified. Moreover, permitting this ill-fitting development to proceed, will set an unhealthy precedent for the future and could easily lead to a rash of similarity ill-conceived development proposals in the Clifton district which will destroy the ambience of the local area. Hence, the applicant should think again and devise something more keeping with the situation of the site.	26-Jun-22

43. O	<p>Whilst I consider that it is a shame that Bristol Zoo feels it must move from its historic and easily accessible site in Clifton to a much more remote and unsustainable location adjacent the M4 motorway as this seems rather contrary to its ecological and conservation objectives, I broadly welcome these proposals. This is because I believe that a carefully designed residential development is the best alternative use of this site. I also consider that it is laudable that the applicants seek to maximise the number of dwellings present and at the same time preserve its gardens. Likewise, I welcome the potential to reduce fly-parking arising from the removal of the Zoo. Nevertheless, I have many concerns about these proposals as they stand. My primary concern is that the buildings are too tall and will overshadow the adjoining properties and dominate this part of Bristol. Thus even a casual visit to the area in which the Zoo is situated will indicate that with the exception of the prominent landmarks provided by several church towers, the Cathedral Spire and the tower of Clifton College, the buildings surrounding this site are of a relatively uniform 3 or 4 storey height. This is true not only of the immediately adjacent area, but of most of the Clifton and Clifton Down areas. As this is not true of the current proposals and I fear the that will visually dominate this area unacceptably. I consider this to be particular problem in respect of Clifton College where it seems that the range of historic buildings adjacent to Guthrie Road will dominated by the new buildings and this will ruin the College's setting by creating an unwelcome intrusion into its backdrop from the south. Whilst placing the taller buildings on the northern site of the site where the ground rises would seem to be sensible, those on the other sides must not be allowed to overshadow the existing buildings on Guthrie, Northcote and College Roads. The current proposals fail in this respect. Likewise, a casual visit to the area in which the Zoo site is located will indicate that most of the building are constructed in the warm colours provided by red sandstone and creamy limestone walls. However, the current proposals seem to be finished in a rather drab cold colour more befitting of a 1970s multi-storey municipal car park than this location and they will do little to enhance its appearance. I notice that the brochure I have receive makes a play of the fact that this development will sit 'sympathetically within the walled gardens' already on the site. To be successful this development must also be sympathetic to the area outside this wall and in this respect, I consider that it fails dramatically. So more need to be done to harmonise this development with its wider surroundings and not just eth former zoo site itself. Consequently, whilst I would not wish to see a pastiche of the surrounding Victorian architecture, I feel a design more in keeping with its neighbourhood in terms of height and colouration could readily be devised. Hence, I feel it rather smacks of something being parachuted in from outside with little thought for its neighbours and needs to be significantly changed. I also consider that Guthrie Road is very busy with Clifton College pupils in term times and so steps must be taken to maximise their safety during the construction of this development. This could best be achieved by the implementation of a Construction Management Plan. As I note that no such document is provided in spurt of this application, I would suggest that it is necessary to devise one forthwith. This strategy must be based on the premiss that works access to the site is obtained only from Clifton Down Road and the large vehicle are not routed through the surrounding residential areas. Overall, therefore, whilst this proposal has much to commend it, I feel that it has a number of fairly obvious shortcomings which must be addressed before it is approved. Under these circumstances I must object to it.</p> <p>Paul Johnson Town and Transport planner</p>	26-Jun-22
-------	---	-----------

44. O	I am disappointed to note that the latest proposal are very little changed from their predecessors meaning that the chance to create a feature which enhances the locale is being lost. It is difficult to see why the promotors are continuing to believe that grey is a sensible colour for such a prominent development as it more suited to bunkers, machine-gun nests, multi-storey car parks, gasworks and other such utilitarian structures. Indeed, its hard to believe that anyone who has spent any time at all in Bristol has noticed that it rains a fair bit and so the use of warmer colours is highly desirable. In short the local residents are the people who will have to live with this development and their opinion on its appearance deserves to take precedence over imported architects. Regards Paul Johnson	26-Jun-22
45. S	This is a rare and unique development that will ensure that this historic site is enhanced and preserved for future generations, whilst creating much-needed eco-friendly housing. The new site has been carefully designed to preserve and enhance native species biodiversity. Additional native planting plus wetland creation is planned and the existing lake will be deepened and the non-native fish species removed, to maximise its biodiversity potential. There are many rare plants within the gardens and they have been carefully identified and list, so that they will be preserved. There are also many specimen trees that will have TPOs added, to ensure that they are preserved. The specialist horticultural and scientific teams at the Bristol Zoological Society aim to be part of the long-term management of the site, to ensure that species are maintained correctly long-term. For several decades, BZS has been working closely with the Avon Gorge and Downs and the proposed visitor centre will provide a much-needed centre for this important committee and provide meeting room and cafe space so that visitors can learn more about this amazing SSSI and its endemic species, so close to a city centre. For the first time in the history of the Zoo, the grounds will be open for the public to enjoy, free of charge. Historic buildings will be restored so that the visitors can enjoy a truely unique experience within a beautiful setting.	27-Jun-22
46. S	Supporting this is supporting a fantastic team to continue to provide conservation, education & Animal care.	27-Jun-22



47. O	<p>I object to this application on many levels: History The 12acre walled site of Bristol Zoo Gardens was well chosen as the world's first provincial zoo, within easy reach of the city centre and adjacent to the Downs and Avon Gorge, a phenomenally rich resource for the study of geology, paleontology, archaeology and biodiversity. Its visionary founders, including Isambard Kingdom Brunel, would no doubt be appalled by the thought that the gardens might now become a housing estate at a time when general education for bio-diversity is so much more urgent than it was 187 years ago. The retention of the entrance building as a visitor information centre is a welcome but relatively token gesture. Diversity Bristol Zoo is the one reason many people of all backgrounds and incomes come to Bristol, and especially to Clifton. Without a significant multi cultural attraction on this site Clifton becomes an even more exclusive monoculture with little else but expensive housing and speciality shopping. There is no good town planning reason why a mature 'green' public and educational attraction of this nature, a healthy mixture of learning and entertainment, should be regarded as a potential site for housing development. The public access statement and optimistic illustrations of diverse members of the public enjoying the gardens are unrealistic. Who is realistically going to go out of their way to walk around an exclusive housing estate other than to see how the other half lives - or to annoy the hell out of them?! In time this right is likely to be curtailed by the residents and the management company's lawyers, whatever provision is currently promised. Accessibility It is all the more vital to retain cultural attractions and centres of education within the urban area if we are to have any chance of moving away from car dependency, which has to be one of the principal aims of Bristol's declaration of a Climate Emergency and desire for carbon neutrality by 2030, an ambitious target by any standards. Three generations of my family have enjoyed walking, cycling or taking the bus to the Zoo and its gardens since the 1970's. We have been members and I am now fortunate enough to be one of the small band of shareholders and feel a deep responsibility to defend the site against inappropriate development, for whatever reason. The need for enabling development for another site lying in another authority has never been a planning principle and should not influence a decision, which should be based on sound planning considerations alone. Affordability Bristol is a city of extremes in terms of wealth and housing with a concentration of wealth in Clifton and the surrounding area. A provision of 20% 'Affordable' housing, largely 1 bed units, is a gesture, but little more than that in an area with particularly high prices. 'Affordable' is a relative term and on sites like this proves to be well out of the reach of the majority of those seeking to acquire a first home or rental in their own city. Low Density This proposal serves very little purpose in terms of contributing to Bristol's severe housing need in either quantity or type. 201 homes, at under 17 units per acre (41 units per hectare), represents a suburban density. It is a minor contribution, both in relation to the opportunities it destroys and in the ability to develop much higher densities, that still respect the urban context, on 'brownfield' sites. Health &amp; Environment As a city and society we face an existential threat from climate change and the loss of bio-diversity. Our young people's physical and mental health is at stake. In response Bristol has led the way in terms of a declaration of a Climate Emergency and we need to get radical if we are to have any chance of even denting the ambition to be carbon neutral by 2030. At the very least new developments in Bristol should aim for carbon neutrality and planning permission should not be granted for any plan that fails to do so. Car access Cars have never had access within the walls of Bristol Zoo Gardens, the only vehicles being maintenance vehicles. This should remain the case. The proposal to provide parking for 124 cars,</p>	27-Jun-22
-------	--	-----------

including 4 disabled spaces, within the development ensures that the development will not meet the aim for carbon neutrality and will damage the environmental quality of life on the site. Any development of this easily accessible site should be car free, with the exception of vehicles for disabled occupants and visitors and a small electric car club, a possible total of 10 spaces. There is a huge opportunity to provide for the increasing number of people who are dispensing with car ownership, in favour of walking, cycling and public transport, and who will buy in to a car-free future. The car parking provision follows the advice of the property agents and planning consultants who know what has gone before but lack the imagination to take the necessary leap to a cleaner and healthier future. Design This site demands a very special approach to design and layout. Yet again we have nationally respected architects imposing the wrong solution on a much-loved Bristol site within the Clifton & Hotwells Conservation Area. Even the published illustrations provided to persuade us fall far short of what we should expect on this exceptional and very visible site. The 5 & 6 storey blocks of flats facing the Downs, Northcote Road and Guthrie Road are underwhelming and relatively utilitarian when seen against the richness of Clifton's architecture. It does not have to be complicated or decorative but it should be built in appropriate natural materials and lift the spirit - which these boxy elevations will fail to do, even with profiles of animals built into the brickwork! In particular the provision of parking at ground level results in bland ground floor elevations and raises the height of the blocks of flats up one storey more than would otherwise be necessary to achieve the same density. A scheme without the need for road access could produce a much more 'organic' and memorable solution that is in the spirit of the place. It is this level of design ambition that this very special site demands, as is well illustrated by the preliminary 'OurWorld Bristol' designs by LDA which received a very positive response to its Pre Planning Application. Landscape The proposed removal of well over one third of the mature trees on the site would be unnecessary with a different approach to the layout and use of the site. It should be a guiding principle that any re-use of the gardens is subject to the retention of at least 90% of the existing trees. The landscape as planned results in excessive road surface and the shared public and private paths is bound to result in a plethora of 'keep out' & 'residents only' signs such as have cropped up elsewhere in similar situations. Precedence Precedence is not always a good planning defence, but if planning is granted for housing within the Zoo Gardens, what defence is there for building housing over the adjacent Clifton College playing fields at some future date? Charitable Status The Zoo Trustees have been wrongly informed that they have a responsibility to achieve maximum price for the land. This is patently untrue. Their responsibility is to achieve best value in accordance with their charitable purposes, which could equally mean an appropriate re-use of the site for educational and environmental purposes. Lobbying There has been strong lobbying, by the Zoo administration to the City Council administration and evident pressure by the Mayor's office on senior planning officers, which is against the spirit of the quasi-judicial role of the planning process which is meant to be independent and immune from political and corporate pressure of this nature. As shareholders we have been asked by the Zoo administration to support this application, a perfectly reasonable request, so it is not surprising that the early barrage of support has come either from those directly involved with the Zoo, or by those who have been canvassed by the Zoo to do so, with a majority of those supporters seemingly having addresses outside the city. I do fully understand that the nature of zoos has to change and that the Society has set its sights on funding the further development of its Hollywood Estate, sited outside the city adjacent to junction 17 on the M5. In

	<p>recognition I have not objected to the development of the Zoo car park on College Road, which is likely to result in a site value in excess of £10 million, although I am deeply disappointed by the quality of its design and layout within the fine Clifton &amp; Hotwells Conservation Area and hope proper advantage will now be taken following the revocation of that planning permission to retain the historic garden walls and improve the environmental performance and its design to reflect the importance of its setting. Conclusion There's a host of reasons why this planning application for the development of the historic Zoo Gardens should be refused, both positive in terms of more appropriate alternative uses, and negative in terms of an unwarranted change of use and character to the detriment of the environment. The possibility of a planning refusal being overturned at appeal is extremely low whatever may be inferred. This is an exceptional decision that has to be taken on behalf of the people of Bristol by its elected planning committee members, free of influence or pressure from the administration.</p>	
48. S	<p>The proposals are sympathetic to the history of the site. It is great that the residential housing is being kept in line with the existing built footprint, and the stunning gardens and open space is being retained for the community to enjoy for years to come.</p>	27-Jun-22

49. O	<p>The objectives and approach of the proposal are ambitious and themselves easy to support however I object to the application primarily due to the quality and certainty offered by the management plan. In my reading the success of this proposal relies on how it will be managed, the quality of the public space, if it will feel public and if it will be retained as public space in perpetuity. I object to the application as it fails to spell out clearly how it will meet its own objective of recreating the gardens as a public space for future generations. I am sure there are many issues to the proposal that could no doubt be improved too which no doubt others and officers may remark upon having leafed through the submission materials at greater length. The high level management plan itself cites a number of schemes, where the most comparable (those being almost exclusively residential) having limited public enjoyment and for the most part being private where, those that I am familiar with, are managed by vehicles that behave primarily in the interest of the fee payers and not the users. Often 'gated communities' even if starting with public access move over time to restrict access and make it feel unwelcoming to the public. Even where public rights of way are present often these private communities are quite effective at diverting or extinguishing them, putting up gates or security apparatus or other paraphilia to discourage public enjoyment of spaces. Whilst it would be nice too see this heritage asset conserved and publicly accessible a management plan that offers no certainty on management approach, such as voting power, make up, accountability or trumping mandate such as a clear charter or other legal mechanism. It is a shame that we are not in a position that a public or publicly minded body can be a custodian of the space such as it being adopted by the council. In addition, the design takes too literally the 'walled zoo gardens' design cue and creates a even bigger continuous wall of buildings and private homes that do little to create new openings, this is likely to sum to the gardens feeling unwelcoming and quite exclusive irrelevant of whether the gates are open or not. Before I can support the proposal I would like to see the better resolved management plan and the design to better support a welcoming and opening environment that better creates a gardens, play area and former animal houses that with some confidence and certainty we can all say are not only public when the scheme is built but also in 5, 10, 20 years time and for future generations. If the proposal is unable to create the public space it laudably strives for and ultimately becomes private then I am quite sure there are other ways to deliver public benefit alongside this development opportunity such as more efficient use of land, more housing, play area located in the downs, relocated animal houses and so on.</p>	28-Jun-22
-------	--	-----------

50. O	<p>The objectives and approach of the proposal are ambitious and themselves easy to support however I object to the application primarily due to the quality and certainty offered by the management plan. In my reading the success of this proposal relies on how it will be managed, the quality of the public space, if it will feel public and if it will be retained as public space in perpetuity. I object to the application as it fails to spell out clearly how it will meet its own objective of recreating the gardens as a public space for future generations. I am sure there are many issues to the proposal that could no doubt be improved too which no doubt others and officers may remark upon having leafed through the submission materials at greater length. The high level management plan itself cites a number of schemes, where the most comparable (those being almost exclusively residential) having limited public enjoyment and for the most part being private where, those that I am familiar with, are managed by vehicles that behave primarily in the interest of the fee payers and not the users. Often 'gated communities' even if starting with public access move over time to restrict access and make it feel unwelcoming to the public. Even where public rights of way are present often these private communities are quite effective at diverting or extinguishing them, putting up gates or security apparatus or other paraphilia to discourage public enjoyment of spaces. Whilst it would be nice too see this heritage asset conserved and publicly accessible a management plan that offers no certainty on management approach, such as voting power, make up, accountability or trumping mandate such as a clear charter or other legal mechanism. It is a shame that we are not in a position that a public or publicly minded body can be a custodian of the space such as it being adopted by the council. In addition, the design takes too literally the 'walled zoo gardens' design cue and creates a even bigger continuous wall of buildings and private homes that do little to create new openings, this is likely to sum to the gardens feeling unwelcoming and quite exclusive irrelevant of whether the gates are open or not. Before I can support the proposal I would like to see the better resolved management plan and the design to better support a welcoming and opening environment that better creates a gardens, play area and former animal houses that with some confidence and certainty we can all say are not only public when the scheme is built but also in 5, 10, 20 years time and for future generations. If the proposal is unable to create the public space it laudably strives for and ultimately becomes private then I am quite sure there are other ways to deliver public benefit alongside this development opportunity such as more efficient use of land, more housing, play area located in the downs, relocated animal houses and so on.</p>	28-Jun-22
51. O		28-Jun-22

52. O	<p>The following represents a slightly revised version of the comments originally posted on August 7th. CHIS strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable. The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape, and skyline of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique. Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely ignored. The following points summarise some of the most blatantly pernicious aspects of the proposals : 1. 196 dwellings represents a massively over-dense development of the site. 2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest. 3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the block on the northern boundary, 4. The proposed terracing is not appropriate in this area. 5. The loss of trees will be compounded by the inevitable damage to the roof systems of many other trees by infrastructure work. We urge rejection of this highly damaging Application.</p>	28-Jun-22
53. O	<p>The minor modifications recently made to this Application entirely fail to address the concerns of CHIS who consider it to be clearly contrary to BCS 22. It represents an over-intense and overbearing development which would, without reasonable justification, adversely affect the character of this part of the Clifton Conservation Area and the setting of its listed buildings. Our views are entirely in line with those of Bristol City Council's Conservation Advisory Panel of which CHIS is a member and whose letter of 20 November 2022 sets out in some detail the architectural poverty of the scheme and its detrimental impact on heritage assets.</p>	28-Jun-22

54. O	<p>The Clifton &amp; Hotwells Improvement Society strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable in their current form. The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape and skyline of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique. Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely ignored. The following points summarise some of the most blatantly pernicious aspects of the proposals :</p> <ol style="list-style-type: none"> <li>1. 201 dwellings represents a massively over-dense development of the site.</li> <li>2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest.</li> <li>3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the six storey block on the northern boundary.</li> <li>4. The proposed terracing is not appropriate in this area.</li> <li>5. The loss of trees will be compounded by the inevitable damage to the root systems of many other trees by infrastructure work.</li> </ol> <p>We urge rejection of this highly damaging Application which, far from leaving a worthy legacy, would irrevocably damage one of the finest sites in Bristol.</p>	28-Jun-22
-------	---	-----------

55. O	<p>The objectives and approach of the proposal are ambitious and themselves easy to support however I object to the application primarily due to the quality and certainty offered by the management plan. In my reading the success of this proposal relies on how it will be managed, the quality of the public space, if it will feel public and if it will be retained as public space in perpetuity. I object to the application as it fails to spell out clearly how it will meet its own objective of recreating the gardens as a public space for future generations. I am sure there are many issues to the proposal that could no doubt be improved too which no doubt others and officers may remark upon having leafed through the submission materials at greater length. The high level management plan itself cites a number of schemes, where the most comparable (those being almost exclusively residential) having limited public enjoyment and for the most part being private where, those that I am familiar with, are managed by vehicles that behave primarily in the interest of the fee payers and not the users. Often 'gated communities' even if starting with public access move over time to restrict access and make it feel unwelcoming to the public. Even where public rights of way are present often these private communities are quite effective at diverting or extinguishing them, putting up gates or security apparatus or other paraphilia to discourage public enjoyment of spaces. Whilst it would be nice too see this heritage asset conserved and publicly accessible a management plan that offers no certainty on management approach, such as voting power, make up, accountability or trumping mandate such as a clear charter or other legal mechanism. It is a shame that we are not in a position that a public or publicly minded body can be a custodian of the space such as it being adopted by the council. In addition, the design takes too literally the 'walled zoo gardens' design cue and creates a even bigger continuous wall of buildings and private homes that do little to create new openings, this is likely to sum to the gardens feeling unwelcoming and quite exclusive irrelevant of whether the gates are open or not. Before I can support the proposal I would like to see the better resolved management plan and the design to better support a welcoming and opening environment that better creates a gardens, play area and former animal houses that with some confidence and certainty we can all say are not only public when the scheme is built but also in 5, 10, 20 years time and for future generations. If the proposal is unable to create the public space it laudably strives for and ultimately becomes private then I am quite sure there are other ways to deliver public benefit alongside this development opportunity such as more efficient use of land, more housing, play area located in the downs, relocated animal houses and so on.</p>	28-Jun-22
-------	--	-----------



56. O	<p>The objectives and approach of the proposal are ambitious and themselves easy to support however I object to the application primarily due to the quality and certainty offered by the management plan. In my reading the success of this proposal relies on how it will be managed, the quality of the public space, if it will feel public and if it will be retained as public space in perpetuity. I object to the application as it fails to spell out clearly how it will meet its own objective of recreating the gardens as a public space for future generations. I am sure there are many issues to the proposal that could no doubt be improved too which no doubt others and officers may remark upon having leafed through the submission materials at greater length. The high level management plan itself cites a number of schemes, where the most comparable (those being almost exclusively residential) having limited public enjoyment and for the most part being private where, those that I am familiar with, are managed by vehicles that behave primarily in the interest of the fee payers and not the users. Often 'gated communities' even if starting with public access move over time to restrict access and make it feel unwelcoming to the public. Even where public rights of way are present often these private communities are quite effective at diverting or extinguishing them, putting up gates or security apparatus or other paraphilia to discourage public enjoyment of spaces. Whilst it would be nice too see this heritage asset conserved and publicly accessible a management plan that offers no certainty on management approach, such as voting power, make up, accountability or trumping mandate such as a clear charter or other legal mechanism. It is a shame that we are not in a position that a public or publicly minded body can be a custodian of the space such as it being adopted by the council. In addition, the design takes too literally the 'walled zoo gardens' design cue and creates a even bigger continuous wall of buildings and private homes that do little to create new openings, this is likely to sum to the gardens feeling unwelcoming and quite exclusive irrelevant of whether the gates are open or not. Before I can support the proposal I would like to see the better resolved management plan and the design to better support a welcoming and opening environment that better creates a gardens, play area and former animal houses that with some confidence and certainty we can all say are not only public when the scheme is built but also in 5, 10, 20 years time and for future generations. If the proposal is unable to create the public space it laudably strives for and ultimately becomes private then I am quite sure there are other ways to deliver public benefit alongside this development opportunity such as more efficient use of land, more housing, play area located in the downs, relocated animal houses and so on.</p>	28-Jun-22
57. S	<p>As a local resident I fully support the application, which will help to ensure the ongoing conservation and education work of the Society. The plans are sensitive to the history of the site, whilst providing public access, play areas and a positive net biodiversity gain.</p>	28-Jun-22

58. S	<p>As a former employee of the Society I fully appreciate and understand the challenges faced by the organisation and I think the Zoo team, Trustees and Shareholders should be commended for these well considered plans. This is a fantastic scheme for the people of Bristol, which also facilitates a sustainable future for the Society. This is a win win! As well as developing much needed homes, this plan makes the gardens accessible to all. The Society have listened to feedback and are effectively gifting this privilege to the people of Bristol - something they should be commended and celebrated for. There is no doubt that the Zoo has outgrown its Clifton site and the move to Cribbs is 100% logical. Clifton is a residential area - and it makes perfect sense to develop this land into housing. The scheme includes new homes located mainly in areas where there are already built structures, with 20% being affordable. Historic assets like the Bear Pit and Monkey Temple will be preserved and restored and there is a biodiversity net gain due to establishing a wide variety of new habitats. The sale of this land will enable to Society to develop the new Bristol Zoo - which will be an incredible asset to the region - home to some of the world's most threatened species, bigger enclosures that more closely reflect animals' natural habitats and a world leading conservation learning centre and conservation medicine centre. This truly will be a forward thinking zoo for the 21st Century. This scheme has my full support.</p>	28-Jun-22
59. R		29-Jun-22
60. R		29-Jun-22
61. O	<p>The leaflet received through my letterbox looks wonderful and sounds wonderful for the people of Bristol. Unfortunately the buildings shown in the computer-generated pictures looks truly awful. They look like some housing project in the Eastern Bloc. Neo Brutalism is the phrase I think. Flat roof, just row upon row of tall boxes with no architectural merit at all. It looks very ugly and uninspiring. Clifton's architecture is uplifting but these plans are not. The Zoo's attempt at making as much money as possible. It will be a sad day when the Zoo leaves Clifton and an even sadder one if we have these plans as a replacement. It will stand out as a huge blot on the landscape, surrounded by beautiful buildings, nasty, looming blocks, with no reference to the surroundings at all. At least the parking/home ratio is better than the Zoo Parking Lot proposal but that's the only sensible thing about it. I trust the the Bristol Planning Department will refuse this application. Any submission should take into consideration the beauty of Clifton, a heritage area, so that the structures blend in with the area. Thank you for your consideration. Geraldine Davies</p>	29-Jun-22

62. S	<p>Our charity (The Natural History Consortium) brings together the region's nature organisations, and was formed through partnership working between the Zoo and others around the city. Twenty years later, we work closely with Bristol Zoo teams who generously share their learning, resources and commitment to conservation with organisations across the region, and beyond. This project is an invaluable opportunity to give public access to the gardens, improving connection to nature and play opportunities for children. There is a clear benefit to provide sustainable housing in a city that faces a housing, as well as ecological, crisis. We are hugely excited for the conservation, learning and communication opportunities of the new Bristol Zoo, and will be seeking to support all areas of this work and share it widely through our Festival of Nature programme as well as to organisations across the UK. We have supported early thinking around the Wild Place site and developments, and supported numerous pilot activities and on-site programmes to ensure that the offer builds on other environmental initiatives in the city. We look forward to working with others to bring this activity to a much wider regional audience of visitors, schools, and tourists.</p>	29-Jun-22
63. S	<p>The existing Zoo Gardens in Clifton can not provide appropriate facilities for the work that the Society now undertakes, or offer sufficient space for animals. The proposal to develop the Zoo Gardens will provide well designed and sustainable housing, including affordable, whilst offering free public access to the preserved gardens. The sale will enable the Zoo to be developed in more appropriate spacious grounds at Wild Place. The new Zoo would be a significant attraction for Bristol and beyond whilst removing traffic from the City.</p>	29-Jun-22
64. O	<p>I am a parent with a child at Clifton college. I have concerns over the windows overlooking parts of the school and the privacy of the children. I also have huge concerns over the vehicular access. The area around the school gets incredibly busy at times. I think within the school community people /drivers are generally very tolerant, safe and patient with each other at passing places and with the children's movements. But it has its moments regardless. But the increased volume of cars from the development will increase the risk of accidents/road rage in the general crazy time that is pickup and drop off. I would strongly suggest the main entrance of the development is positioned well away from the school community.</p>	29-Jun-22

65. O	<p>On Behalf of The Avenue Residents Association. BS8 A number of residents of The Avenue have asked the Residents Association to object to the plans as proposed. There are numerous objections but they can be summarised as follows: 1) The density of the proposed development is far too high. It is clear that the Zoo's only interest is to maximise profit without any regard to the legacy it will leave. 2) The height of the buildings will significantly impact light on adjacent properties and will be an eyesore. 3) The design of the proposed is out of keeping with existing properties, looks awful and will age in a very short period of time. 4) The comments on parking are naive and frankly ridiculous. The Avenue will be clogged with residents and their visitors. 5) The traffic access onto Guthrie Road will cause severe congestion and will be a safety hazard especially during busy hours at the school. Even at the moment it can take 10 minutes to access Pembroke Road from The Avenue during school drop off. There have been several near misses with school children already. There has been no consideration of vulnerable road users. Regards The Avenue Residents Association.</p>	29-Jun-22
66. O	<p>As a Bristol resident and parent I am very concerned about this proposed development and strongly object to the plans presented. Whilst I understand there may be a need for the zoo to move from this historic location, the plans put forward for the development of the site would seem to have a number of issues that have not been considered. This development neighbours a school, and in fact children circulate the area from other nearby schools too both in the morning and afternoon. I am a parent of schoolchildren in the area there. The amount of traffic, parking and access considerations seem to have been overlooked in the context of safety for nearby residents and also school children and parents dropping children off to school. There are many children in the vicinity, particularly along Guthrie road, the Avenue, College Road and Northcote road where all the school building are. This feels like an extremely dangerous development as regards the safeguarding and safety of children. By necessity, children have to travel between buildings or for pick-ups and drop-offs, and for the older children, they will be unaccompanied by adults so are at huge risk of a road accident or other more horrific risks, particularly in the winter when it is dark. The school is co-ed so there will also be potentially vulnerable pupils walking on the pavements and crossing roads in large numbers, as well as individuals late at night. There are many evening functions and boarding houses in the area leaving students particularly at risk. I would strongly object to the plans on that basis alone. In addition to that however, and again with the safeguarding of children playing in school playgrounds, or walking between classrooms, these unsightly and far-too tall buildings being proposed present a real risk for those children. These children will be overlooked and could easily be targeted or abused. There is already an issue with poor lighting in the area from a safety perspective, but the large buildings will further block sunlight and create more danger. Apart from the final design failing to take these issues into consideration, the designs as presented also fail to take into consideration the character and historic importance of the architecture in the area. They don't seem to fit and would create an unsightly, out of character set of eyesores. This is a conservation area after all. Given the lack of consideration in the aspect and overall plans, I would also be very concerned that the actual construction process itself has been equally poorly considered. These building works will take some years, which will mean construction taking place throughout the schooling year and in particular through the periods of public exams. Having come from a few years of Covid where</p>	29-Jun-22

	<p>children have been massively disadvantaged, I can not imagine supporting a scheme that will force this disadvantage of heavily disrupted education and examinations being perpetuated. Given these will be the particularly difficult years when results are re-normalised, this will be of great disadvantage to the futures of hundreds of students in the schools in the area. Seemingly, this is not a concern of these developers. So on the basis of these concerns, I would like to record a strong objection to the plans as presented. Kind Regards</p>	
67. O	<p>As a mother of daughters whom attend Clifton College, I worry some what on the childrens safety if this proposal goes ahead. Parking and traffic isnt great down the documented roads already surely this development will only make it worse. Park and play area?, with this being open to the public is this going to bring youths to the area thus more space to graffiti, damage and a show ASBO behaviour? Will this attract homeless and drunks to the area? How will this be patrolled.? I dont believe this development will bring anything positive to the area. I</p>	29-Jun-22

68. O	<p>I live in the close vicinity of Bristol Zoo and my 3 young children attend Clifton college. We spend lots of time in and around the zoo area and surrounding streets at a variety of times of the day. It appears that the scale of this planning development has taken absolutely no consideration to the already severe pressure on traffic at the beginning and end of the day. Traffic is frequently already backlogged all the way back to the suspension bridge at the end of the day and in the morning we have observed how traffic is consistently building against the A4176 in the mornings. There will be a huge volume of traffic with the addition of over 200 more dwellings. This will not only detrimentally impact the air surrounding our houses and school from the standstill traffic but also cause huge safety concern for the large number of school children on foot attending both our and the other schools in the areas. There is already significant pressure on drop off at the school which will become completely untenable with the additional traffic. Bristol council would be showing a complete disregard for the safety of children if they proceed at this scale. Further to this, the proposal to build 5 story buildings alongside Northcote road will significantly alter the character and charm of the area of significant architectural beauty and integrity and seems unfathomable in a conservation area where development on residential properties. They dwarf the scale of current buildings and will significantly harm the visual environment. The proposal does not take into consideration the close neighbours or show any regard to the functioning of the school which is in such close proximity to the development.</p>	29-Jun-22
69. O	<p>Having read the design documents as well as comments made by others, there are some very obvious areas where significant changes and improvements must be made. It must be possible with enough thought and reflection to generate proposals that are not so divisive. Here are my main points: 1. The proposed buildings are of materials and designs that do not fit with the surrounding historic and beautiful architecture. They are immature, trendy and lacking in any kind of sensitivity. 2. The proposed heights again, are not in keeping with the surrounding architecture - the proposed buildings are too tall. 3. The whole design looks far too modern and ugly - too much like a design statement that will be a source of temporary pride for the very few and a source of long-lasting upset for a great many. There are very few places in Bristol that are so beautiful - most have been severely spoiled by limited, short-lived ideas of what constitutes improvements. This design is not an improvement. It spoils the whole area and needs to be started afresh. Thank you.</p>	30-Jun-22
70. O	<p>As a parent at Clifton College, I am highly concerned with both the increased traffic the redevelopment into this number of residential properties and the change of tone for the area. There have already been a number of near miss events with children, young and old being in danger of being run over by cars. A development of this nature and size will only increase this potential for one of these near misses to become a tragedy.</p>	30-Jun-22

71. O	<p>Having examined the plans for the Zoo (a place I have regularly attended with my children for the past 12 years). I have considerable concerns about the proposed plans for it's development. From a building perspective I understand that the Zoo have been told they can only build where current buidlings/enclosures exist and sadly this is contrary to what would be best for the neighbours. In particular the College (where I work). It would place some tall 4+ storey buildings around the edge of the site overlooking the neighbouring houses and in places over looking the school playgrounds and boarding Houses. The height itself would be considerably overbearing compared to the height of the buildings surrounding and it would act to block light from classrooms and houses. In truth, for the neighbours, it would be far better for the buildings to be lower and more central to the site. Furthermore the access to the site, if not planned correctly, will cause huge issues for all involved. All roads that surround the Zoo are very heavily utilised. Not just by vehicles passing but by school buses stopping and by pedestrians (children) walking by. This is hugely concerning at the best of time but has the potentially to be very dangerous during the constructions period. At the College the safeguarding and protection of the students are central to all we do the development of the site in this proposal appears contrary to that. The idea that permission would be granted for tall buildings to look directly into the boarding houses of young children is inconcievable. I understand the need for the Zoo to make money from the site but it is clearly a case of cramming as much accommodation as possible onto a school side to make money at all costs. Given the nature of the surrounding area in terms of building types and use (the College). This particular proposal should never be allowed to proceed.</p>	30-Jun-22
72. O	<p>Dear Sirs With regard to the proposed planning on the former Zoo site, I feel I have no choice but to object to the proposed plans I fully appreciate that we need more housing and that this site could be used for this , but why in a conservation area would such an ugly, overbearing and completely out place development be proposed ? I live in this area and I even have to get permission to maintain and cut my trees , yet you are seriously proposing this development , I am sorry but it simply does not sit and leaves many unanswered questions So much could be done with this site for it to provide dwellings but in keeping in an area we have all been made fully aware is Conservation and must be respected There is no Conservation considerations with these's plans How very sad that yet again large developers are allowed to destroy beautiful area's with ugly buildings , why are we destroy our heritage that we will never get back</p>	30-Jun-22

73. O	<p>Dear Sirs Although I thoroughly appreciate that we need more homes , I find it impossible to understand why on this beautiful historical site we would consider such a plan The infrastructure surrounding this site simply makes no sense ,the roads can't cope with the existing traffic , the doctors surgery cannot even offer existing patients appointments due to volume and where are the school places going to be found? I understood that bristol Council were very green and wanting us off the roads , as there are no local school places you are going to have parents needing to drive children to an available school , how is this environmentally friendly and working with the Councils policies , its a total contradiction to what the council are preaching to us Furthermore , the proposals so close to a school , where there are children walking around and crossing roads , how can you not even consider their safety fo all sorts of reasons , we have a duty of care to our children. This is a beautiful ancient site that we are going to desecrate with housing , surely the alternative plan for a virtual zoo is amazing , educational, forward thinking and firmly puts Bristol on the map as a city that really does care about the environment actions speak louder than words and the existing zoo can only benefit from this . It is so sad to see that no imagination is been given to this site , I despair for the future of our children and young people</p>	30-Jun-22
74. O	<p>I am very familiar with the Bristol Zoological Gardens site in relation to Clifton College. As such, my serious concerns lead me to object to this planning application especially with its inclusion of 201 homes. Specifically, my concerns relate to the following: 1. Safety regarding use of public highways, particularly that related to children on the routes of Guthrie Road, Northcote Road, College Road and The Avenue. 2. The possibility that proposed new buildings will overlook areas of school grounds and buildings. 3. The possibility that the proposed developments adversely impact areas of school regarding daylight/sunlight. 4. The impact on this remarkable Conversation Area and the heritage that it embodies. 5. The very likely possibility, in my view, of site construction causing operational difficulties for the school.</p>	30-Jun-22
75. O	<p>My children attend Clifton College and I am extremely worried about these plans. How can such a beautiful plot have so many houses on? How will the already busy roads cope with the amount of cars these houses will bring? How are the children's safety who use these roads to get to their lesson houses going to be kept safe? I strongly object</p>	30-Jun-22



76. O	<p>As a member of staff at Clifton College, I am very concerned about about a number of points with regard to the redevelopment of the Zoo site into residential units. The parking and access in the surrounding roads is already very busy. Clifton College is a large school with many parents dropping off/collecting their children each day. Combined with the neighbouring houses, the roads can be quite dangerous at times with lots of children close by and I feel this will only make the situation worse. I am also very concerned about the height of the residential buildings and the proximity they are to Clifton College's boarding houses. It is quite clear that the residents of the new development would overlook into the school's buildings which is a huge safeguarding concern. It is quite clear there has been no thought into how this development would impact the Zoo's neighbours especially Clifton College and the children who attend it.</p>	30-Jun-22
77. O	<p>I strongly object to the plans to build a luxury housing estate on the site of the Bristol Zoo Gardens. The gardens have been open to the public for 186 years. The queues of people visiting the Zoo before it closed demonstrates its significance to generations of people of Bristol. The historical and environmental damage this development will cause are not justified. The whole of the beautiful gardens and planting on this site should be preserved with its mature trees, historical herbaceous border, various ecosystems and the amazing biodiversity it offers (per the BZS website) for future generations to enjoy. Examination of the financial reports for the Zoo show that the Clifton site is financially viable. Losses have been generated by millions of pounds being spent on consultancy fees to facilitate the sale of the site. Although there were no visitors during lockdown, the Zoo received £2.5million in business continuation insurance. Indeed the Zoo generates far more money and visitors than the Wild Place. The Zoo has misled the public into believing that the sale of the Clifton site is necessary as the only option. This is not the case as the KPMG report they commissioned includes other possible courses of action - none of which were presented to their shareholders. The Clifton site is listed as a local Historic Park &amp; Garden and an Important Open Space. It should stay this way. There is much public goodwill and support to explore options that will keep this site as a public green space rather than a luxury gated housing estate "Saving Wildlife Together" is the motto of the Zoo. The Council should start by saving the wildlife and biodiversity of the Clifton site by saying No to the Planning Application.</p>	30-Jun-22

78. O	<p>I strongly oppose the plans for the zoo gardens for the overbearing nature of the proposed blocks of flats that show no sympathy for the Clifton conservation area and the neighbouring buildings. lack of sympathy the design shows for this conservation area and its neighbouring buildings, the poor quality of the public park, loss of sunlight to neighbouring streets and the access issues around Guthrie Road. The proposed buildings give the appearance of a prison block and are totally unsuitable for a conservation area. The perimeter buildings are too overbearing, too large and extensive, too close to the perimeter and have no sympathy in scale or design to the neighbouring buildings. The new buildings completely overshadow and dominate the Zoo entrance building. The view of the site from the Downs will be a wall of modern buildings that remove the feeling of openness and visual amenity from the Downs where currently the buildings are well below the tree line. The main access point on Guthrie Road opposite the school is completely inappropriate for such a large site. This is a street with chicanes to slow traffic, which makes it hard for traffic to move along it. On top of that, the stretch of road next to the site entrance is used by the school to load and unload school buses several times each day- other streets being unsuitable for this purpose. If the main entrance is located on Guthrie Road, the number of dwellings on the site needs to be decreased significantly. The public park is hidden away within this gated community with controlled access. The wall of tall surrounding buildings will deprive the park of sunlight and make the area feel walled in. The access roads within the site represent further loss of green open space. The beautiful heritage gardens will be ripped up along with established trees. This is not conservation. The neighbouring streets will lose sunlight for much of the year as they will be overshadowed by the excessively tall, uninterrupted blocks of flats.</p>	30-Jun-22
-------	---	-----------

79. O	<p>I strongly object to the plans for the Bristol Zoo Gardens. The layout of the site, with overly tall buildings around its perimeter, and narrow gated access makes it feel unwelcoming to the public. Much of the public garden space shown on the plans is actually access road and should not be classified as garden space especially as most of the car parking spaces are in the central part of the site. There is no similarity to the amenity of the current zoo gardens. There does not seem any guarantee that once the development is completed that public access will be maintained to the gardens in the long term. Such access is more assured if the public gardens form a solid area fronting onto Clifton Downs Road rather than lost within the gated community. I object to the loss of a visitor attraction that brings people into Clifton from outside Bristol. The community conservation centre is unlikely to have the equivalent economic value to the area and this negative impact has not been taken into account in the economic report. The public gardens have been dubbed down into an area surrounded by and crossed by access roads that are overlooked and shaded by excessively tall buildings around its perimeter and within it. I object to the amount of traffic that will be generated around the local roads of the site by this volume of housing plus that of the West Car Park site. No account seems to have been taken of parking needed by visitors to the residents of these sites. The loss of the car parks on Clifton Down Road is not mentioned. These visitors and the Clifton College drop off/pick up traffic will create substantial parking problems in the area with cars driving around looking for parking spaces, on top of all the additional traffic wanting to access the site. All this excess traffic is of a concern for the safety of the pupils of Clifton College who spend a lot of time each day walking between buildings in this area. The density of the development is too great to maintain public safety around this site. I object to the design of the perimeter buildings. These are all too tall, reducing the light into the public gardens substantially. The surrounding roads will feel like dark alleyways - especially College Road with blocks of flats situated close to the road on both sides. The architectural design bears no relation to the historical buildings that have been preserved nor to the surrounding buildings of Clifton conservation area. I object to the view of the site from the Downs with its 6 storey tall buildings built up to the boundary wall. The frontage should be no more than the current two storey height.</p>	30-Jun-22
-------	--	-----------

80. O	<p>I think that there are far too many properties proposed for the Bristol Zoo site, I am concerned about the surrounding buildings in Guthrie Road and Northcote Road, owned by Clifton College, being seriously overlooked, one of which is a boarding house for younger pupils, which currently overlooks the sea lion and penguin enclosure. I am also particularly concerned about the extra traffic generated by large demolition trucks and delivery vehicles, which will cause major disruption particularly at school pick up time and the associated risk with pupils crossing the roads, Clifton College is a very large campus and all our pupils need to cross roads around the back and sides of the zoo to access different buildings for lessons, we also have deliveries to our kitchens throughout the day and use a large fleet of mini buses which need access in and out of Guthrie Road all day. Another concern is the parking, some of our employees have parking permits and will find it difficult to use the permits that they pay for if the roads are filled with contractors vehicles. Clifton College is a residential college and so there are a vast amount of pupils on site 24/7, the college also operates six days a week, so this development will have a major impact on school life and safety. I object to this development as it currently is and would like to see less properties built and some type of viable scheme to address the safety and access issues I have raised.</p>	30-Jun-22
81. O	<p>I am very concerned about the impact the proposed development could have on the safety of the children attending Clifton College. 1. The loss of the Bristol Zoo car park for drop-off and pick-up will increase the traffic on the surrounding roads to dangerous levels. 2. The volume of construction traffic is likely to impact the children's ability to safely move between the school buildings. 3. The noise/building dust from a large development could have hugely negative implications for their wellbeing and learning. 4. Construction period safeguarding concerns - with a large volume of contractors coming and going, how will the children's privacy be protected? 4. Future safeguarding concerns - ensuring the new buildings from having direct sight of the playgrounds/into classrooms. 5. Reducing the available light into the classrooms/play areas could have a significant impact on the mental health of the children.</p>	01-Jul-22

82. O	<p>I appreciate the Zoo needs to do something with the site if it's not sustainable to run in it's current form and that housing is the obvious choice, however I'm concerned about the impacts on the school that neighbours the zoo on multiple sides. Firstly the amount of traffic/heavy vehicles that will be moving around through construction and after will make it difficult for the children, especially younger ages to move around the school safely. After construction has completed there will be a lot more cars looking for parking in the area given the number of proposed spaces meaning lots more cars moving around hunting for an on street space. Even if parking is provided for all residents then opening up new car entrances on Guthrie Road and Northcote Rd so close to the school will increase traffic in areas with children crossing regularly. Secondly I'm concerned around the number of homes that will be overlooking the school and the impacts this could have. Finally the construction itself and the noise generated will have an impact on teaching at the school and wellbeing of the pupils given close proximity.</p>	02-Jul-22
83. O	<p>While I understand the viability of the site as a Zoo is no longer there and funds are needed to relocate to the larger site, as a local resident and parent of a pupil at Clifton College, I object to the proposed plans for the following reasons:-</p> <ul style="list-style-type: none"> <li>- The density of housing. This is too great and the design of the perimeter buildings are too tall. This will result into a loss of light onto the central public gardens proposed, neighbouring houses and Clifton College. There is also a safeguarding issue where buildings will overlook Clifton College classrooms, play areas and boarding houses.</li> <li>- The loss of opportunity for a community facility/visitor attraction for the benefit of Bristol City and beyond. The public gardens proposed will not be a go to destination. They are too embedded within the site, surrounded by overly tall buildings. The Community Conservation Centre feels like a token effort and unlikely to bring the same economic value to the area.</li> <li>- Increased traffic around the site. The construction and then cars used by residents and their visitors will have a negative impact on the safety of Clifton College pupils who travel on foot to/from school and between lessons walking around the perimeter all day into the evening, including weekends for Saturday school and boarders.</li> <li>- Architectural design bears no relation to the historical buildings within this Clifton conservation area. They will date really quickly. I believe the proposed plans will have a negative impact for the all of the above reasons and I strongly object in particular because of the impact on the safety and safeguarding of pupils at Clifton College.</li> </ul>	02-Jul-22

84. O	<p>I am concerned about this proposal for the following reasons: 1. The (road) safety of children attending Clifton college. This development backs on to both the prep and main school. At regular times of the day you will see lots of children crossing the roads to move between school buildings. They tend not to cross at the pedestrian crossing and take the shortest route across the road often without due consideration to the traffic. I am very concerned about the planned increased traffic around the site. There is also no parking for parents who pick up and drop off at the school which will further add to general congestion and safety issues. 2. There are 201 houses and 120 car parking spaces planned. The latest census information from Bristol Council (2011) showed the average car ownership was 1.04 cars per household. Other estimates suggest that this has risen to 1.39 in the south west over the last 10 years. Whilst cycling spaces have been provided it is naive to think this will not cause a problem on the surrounding roads and within the site itself. 3. The flats surrounding the perimeter of the development overlook boarding houses and are too close to the stunning and historic buildings of Clifton College. These proposed buildings will ruin the general area aesthetics of the area.</p>	02-Jul-22
85. O	<p>Disgusted that the council would do this right next to a large school, the traffic is already a problem and with all the machinery and noise will be added stress and disruption to the pupils. The building proposed is not even nice to look at. It will block natural light, be a strain on resources, take potential green space and all the added traffic and dangerous machinery will be a health and safety issue. Sounds like a greedy project to line someone's pockets and I like the majority object. It's not even planned to be affordable. No need to create more stress and grievance to a bottle necked area anyhow and right next to children. An accident waiting to happen too</p>	02-Jul-22
86. O	<p>I must object strongly to these proposals and ask you to consider carefully the what this is asking. I live locally to the zoo and commute into the area every day. The traffic flow around the local area is already a significant challenge and there are a large number crossing the roads at these times. Therefore, I have significant Highways safety concerns, especially along Guthrie Road, Northcote Road, College Road and The Avenue. The zoo is a wonderful site and we are very sad to see it go, however it would such a shame to see this replaced by 201 homes and would not be of benefit to the local area. History would not look favourably on such a decision. It would ruin the appearance of the Conservation area and the character of such an important area would be lost. With a boarding school as its neighbour these homes would look over into an education establishment which is simply not appropriate. Please do not allow this proceed, it is not right. The city of Bristol is dong so much that is positive and this would not be in tune with that. The local infrastructure and environment cannot cope with this addition and the history of this special corner of our city would be lost. Thank you for considering my objection</p>	02-Jul-22

87. O	I write to object to this planning application on two grounds. Firstly, that the proposed boundary buildings, for example Blocks E and F, are much too tall. The Street Elevation of Clifton Down is particularly out of scale with the neighbouring buildings and streets. This area of Clifton is a Conservation Area and as such new building should either preserve, or enhance the area. These bleak blocks of housing that are noticeably taller than the surrounding houses fail on both these counts. Secondly, that the present buildings are architecturally intrinsically interesting, much of it Listed, but the proposed boundary dwellings show no link with this historic site. The proposed boundary dwellings (eg Block E1, E2) look like off-the-shelf designs, not site-specific buildings.	02-Jul-22
88. O	Raising concerns over highway safety on what is an already busy road particularly around school drop off/collection times.	03-Jul-22
89. O	Dear Sir or Madam, I am writing to you concerning the proposed development of the Zoo gardens in Clifton and would like to make the following points and a counter suggestion. For sake of brevity I am making them in point format. 1. The suggestion as described makes no mention of the soon to be ongoing development in the Zoo car park off College Road. So it is not just the 200 households as described in the Zoo gardens in the reference above, but the two developments together and considerably more households will add considerably more pressure on traffic congestion including parking. 2. There are two main schools in the area: Clifton High at the other end of College Road, and Clifton College (including a prep School and a nursery) along College, Guthrie and Northcote Roads. At present the area is primarily an educational and residential area, but if the developments were to go ahead, this delicate balance would be destroyed. 3. There will/would be considerable congestion at schools' dropping off and picking up times. The assumption is made that at least some of the residents of the proposed development would be dropping off picking up their own children at the same or similar times. There is already an unacceptable amount of illegal parking, occasional drive blocking and 'frustrated driving' at these times especially and the situation would become much worse. 4. The proposed height of the developments is clearly unacceptable especially for the residents of Northcote Road, and College Road, with an increased lack of sunlight. I am sure the residents will make this point and others more in depth and clarity than me, but I can sympathise with their predicament. 5. There seems to be little provision for residents' and guests' parking within the development. There would be more households than allocated parking spaces. At a recent meeting at Clifton High School, this issue was raised and the response from the floor was that peoples' behaviour will change. Gasps could be heard in the audience. There seems to have been no provision for social services (carers etc) attending the elderly and others. Never forget we are living with an ageing population. Much correspondence of this nature tends to be of a critical nature with few, if any alternative or positive suggestions. May I briefly make a couple of my own. 1. The development should consider having the same 'density' of proposed housing/residents as the surrounding area, Canynge Road, Northcote Road, The Avenue etc. Of course, provision for the fact that both Schools have extra land (playing fields etc) should be taken into account. 2. Architects might consider at looking at revolutionary parking techniques. (Singapore, for example where admittedly small cars were parked on large balconies adjacent to their owners' flats. One drove ones car into a lift and drove out onto the balcony of ones own flat). 3. The boundary of the development seems finite, perhaps guided by existing walls and	04-Jul-22

	<p>possible legal constraints. The development could be extended by for example incorporating the existing car park at the top of the Avenue/Northcote Road, enabling the developers to reduce, for example the height of the proposed properties along Northcote Road, College Road. In conclusion, I wish the Zoo every possible success in the future and its legacy in Bristol and beyond is an excellent one. However, the developer's proposals I have read and heard, as they stand, seek to undermine that legacy. In short the proposals if enacted unchallenged will be an example of levelling down, not levelling up. Thanking you for your kind attention. Kind regards Paul Bartlett. MA</p>	
90. O		04-Jul-22



91. O	<p>Dear Development Management Team Re: Bristol Zoo Gardens - Application 22/0737/F - Objection to Bristol Zoo Planning As a deeply concerned resident of 6 Northcote Rd and unofficial "Chair of the Northcote Rd Residents Association" I object to the above application on several grounds. I am not an expert but have tried to read and understand the 200 documents provided as best I can and their implications. If I have unwittingly misinterpreted anything I hope allowance will be made for this. I also hope there will be plenty more time to get independent expert advice and for more genuine dialogue and consideration to be given before any decisions are made. Key General Objections and Comments: 1. The sheer scale, length, height and form of the proposed perimeter residential blocks as it currently stands will significantly damage rather than preserve or enhance the character of this beautiful, historic Clifton Conservation Area in general, beyond the Zoo Gardens. It will dominate and intrude into the local neighbourhood in the adjacent streets. It will significantly reduce the sense of spaciousness and residential and visual amenity that is currently a feature of this area. It will significantly deprive people of the views of sky, sunlight and the glimpses of mature trees as they live work and play (the children in Clifton College) in the neighbourhood. 2. These same characteristics of scale, height and proximity have resulted in numerous breaches of BRE planning guidelines for reductions in daylight and sunlight within the proposal adversely affecting many of the directly neighbouring properties, residents and children. This is already causing many people significant stress and worry about a real deterioration in their living and home working environments. The scale and impact of the losses of daylight and sunlight for most of the neighbourhood adjacent to the Zoo has been significantly under-represented. The report provided by the Zoo's daylight and sunlight surveyors appears to include many significant errors and numerous omissions in the presentation of its data. However, if this scheme were approved, based on the data presented and contained within the reports it appears there will be significantly darker and gloomier winters for much of the neighbourhood and almost all of the adjacent residents. This is contrary to impressions implied by the surveyors' written conclusions. In an environment when we are increasingly understanding the importance of mental health and wellbeing for adults and children and we are aware of the vital importance of daylight and sunlight, surely we should not be choosing to breach BRE guidance in such an important aspect merely to aid additional profit for the few. 3. The scheme does not appear to be as environmentally positive as implied which is extremely disappointing for a proposal from the Zoo. 4. The suggestion that a few access entrances will make the gardens a wonderful unique community asset that many people beyond the neighbours will visit, seems overplayed in an area where the magnificent Clifton Downs are adjacent. 5. Although the scheme clearly satisfies the planning requirements for social housing there would seem to be very little social benefit that a 20% price reduction on price and 30% reduction on rents in c.40 Clifton properties (built over several years) which command almost twice the price of other properties in many other parts of the city. Thus, this development should not be considered as a major social benefit nor a reason to build an unnecessary large numbers of homes to maximise the profits for the Zoo if it is to the immediate and permanent detriment of the local community and the historic character of the conservation area. This is especially true when there are so many more and better located brownfield sites elsewhere that can build higher quantities of more affordable housing. 6. Even if permission were given for a reduced scale of lower level housing to a more environmentally suitable scale (perhaps 50%) one questions whether this really is the best use of such an absolutely unique heritage 12 acres</p>	04-Jul-22
-------	---	-----------

site. No matter how nicely it is dressed up, the greater likelihood is that this proposed development will simply become a pleasant, affluent housing estate with some nice gardens and a nod to social housing. It will not really do anything to help the less well off and most needy, nor will it contribute anything substantial to the housing shortage. It will perhaps provide c.60 new homes per year, (12 "affordable") with the first phase completed in 3-4 years' time. Neither will it provide much of significant benefit to remaining non-Clifton Bristol residents. Overall, the development seems much more likely to leave a permanent, unwanted and "visible legacy of darkness" for its neighbours depriving them of far more pleasure and amenity in the short and long term than it will ever return. Without being a planning expert but just by walking around the perimeter it is fairly easy to imagine that many of these problems and most of these objections might be resolved - quite simply, by reducing the existing heights of all the blocks of flats by two storeys around the entire perimeter. Of course, this would limit the potential profit from this particular development and this particular site. However, this profit can only be realised and is only significantly increased by the agreement for change of usage to allow the development of high value housing. This is why we very much hope and are relying on Bristol City Council to make the right long term decision for both Clifton and Bristol. Its role is not to maximise profit for developers. If it does make the right decision then it can help ensure the Zoo and its trustees do leave a legacy they can be proud of rather than a "dark legacy of resentment" to the Clifton Community in which the Zoo has resided for over 150 years. If this current application were approved the latter legacy would seem to be the more likely outcome. The Northcote residents have been very frustrated, disappointed and distressed that the zoo planning team have pursued this planning application with such apparent disregard for the clearly expressed concerns and constructive suggestions made during consultations with their neighbours. The Zoo team have produced a number of impressive professional documents in support of their proposal. However, these appear to provide a rather flattering gloss over the plan's defects and its limitations and impacts. The zoo has repeatedly made it clear to us that the planning application has been submitted with the intention of extracting the maximum potential value for the site, albeit within a significant number of constraints due to the special and unique historic characteristics of this site. This proposed plan demonstrates that intent very clearly. More Specific Detailed Objections and Comments: Breaches in BRE guidance for Daylight and Sunlight: Devla Patman Redler report The Zoo team's Savills surveyor has admitted that these surveys are something of a "dark art" so I thought I would look at these closely upon the advice of a professional planning consultant. It was pointed out that surveyors are unlikely to produce reports for their clients which suggest that the proposed scheme's viability is threatened as a result of breaches in the BRE guidance on light reductions. Disturbingly, there appear to be a significant number of clear errors and even large numbers of omissions in at least some of their tables of source data provided in their appendices. By using N/A in certain rows of their appendices they have omitted to show and include many dozens of windows that that experience adverse effects of greater than 20% reduction for the Vertical Sky Component and 20% reduction in the Annual Probable Sunlight Hours. Each of these 20% reductions in light represents a breach of BRE guidance. I estimate there are many dozens of errors and possibly hundreds of omissions. This has resulted in significantly incorrect percentages being quoted and I have not found the report to be impartially or fairly representative. All the errors and omissions seem to be in the favour of the development despite the many breaches of the BRE guidance with subsequent

widespread negative impacts on much of the neighbourhood. 6 Northcote Rd For example, at 6 Northcote Rd, First Floor where we live, the summary table only shows a reduction in VSC of greater than 20% on 1 window rather than for the 3 windows that the data clearly implies - if the calculations had been completed correctly. These 3 windows represent 100% of our most important living space as they are our prime living and working space 16 hours/day in a post Covid working from home environment. As far as we can envisage, we will actually lose almost all sight of the sky from the room and simply be looking from all parts of the room and beyond at a plain brick wall just 21 metres away. This wall will tower several metres above our windows and the skyline on this floor. This brick wall "feature/view" will intrude into and throughout all the key living spaces in our flat even including the kitchen. The data would also appear to indicate that we may lose more than 20% of our Annual Probable Sunlight from especially in the winter months when sunlight is scarce. However, this data is not highlighted in the report. The impact of such developments on our lives and wellbeing would be massively detrimental, especially as one of us is prone to SAD in winter. We don't really understand the NSL calculations so we can't comment usefully except to say that in light of the data and the presentation of what we have seen so far in this report we are deeply concerned and very distrustful. Elsewhere: Across the report we note numerous VSC errors and omissions: Table 10.2 6 Northcote Rd should indicate that 5 out of 17 windows (29.4%) have more than 20% reductions in VSC (failures) rather than 3 out of 17 failures (18%) as reported. Note this equates to a significant 63.3% error in favour of the proposal. 5 Northcote Rd indicates only 1 window out of 11 has more than 20% reductions in VSC (9%) when the data shows 4 failures (36.3%) 4 Northcote Rd indicates 1 out 11 windows (9%) fail when there are actually 3 failures(27.3%) 3 Northcote Rd indicates 4 out of 14 windows fail (28%) when there are actually 7 failures(50%) 2 Northcote Rd indicates 7 out of 15 windows (47%) when there are actually 8 failures(53%) 1 Northcote Rd indicates 8 out of 15 windows (53%) fail when there are actually 10 failures(71%) Pooles House indicates 17 out of 71 windows (24%) fail when there are actually 23 failures(32%) Everything appears to have been significantly (mis)represented in favour of the development - I have estimated 71 errors and as many of these houses are split into flats the percentage impacts of these losses can be very significant for different households. Annual Probable Sunlight Hours As far as I can see the tables in the appendix are full of N/A's which do not generally show the percentage sunlight reductions nor do they show the calculations for the amount of APSH lost across hundreds of windows Pt. 4.15 states: o Sunlight will be adversely affected if there are 0.8 times former sunlight hours during either period o The reduction in sunlight will over the whole year will be greater than 4% APSH Pt. 10. states: If the overall annual loss is greater than 4% of APSH, the room may appear, colder and less cheerful and pleasant. However, for the data provided for the Northcote Rd residential properties it would appear that over 95% of the windows will get a reduction in APSH greater than 4%. Over 90% of windows will get reductions of over 20% light in the winter months, some from existing low levels of light, especially the lower floor flats. This is a significant adverse impact for very many people which has not been highlighted in the surveyors' report The level of both errors and omissions in this report would appear to significantly undermine the accuracy and validity of the numbers quoted and potentially, the conclusions about the adverse impacts of this development. If the same level of omissions or errors is true across the whole report, across all the properties it appears to massively underplay the impacts of the loss of daylight and sunlight on the direct neighbouring communities to the Zoo's perimeter. The

	<p>Townscape and Visual Assessment The proposed development is in a wonderful, unique and historic conservation area where the guidance states that: See Planning (Listed Buildings and Conservation Areas) Act 1990, section 72, paragraph (1) 72General duty as respects conservation areas in exercise of planning functions. (1)In the exercise, with respect to any buildings or other land in a conservation area, of any [F1functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. Much has been done within the inevitable constraints of the site itself within the walls to preserve the main beautiful features as far as possible - given the desire to build hundreds of housing units! Unfortunately, this has resulted in the housing being pushed to the perimeter wall. Here, it is clear that in many cases the net effect is the opposite of preserving or enhancing the conservation area within which the Zoo sits. The biggest problem seems to be the sheer scale, length height and form of the structures in such close proximity to the neighbouring residents and streets. While some of the structures might work in some places as small infills in a district, this entire development is on a very different scale. i) There is almost 600 metres of a continuous modern blocks flats which is entirely out of character with the conservation area. The combination of height, continuity and proximity to the wall especially on the narrower streets such as Northcote Rd will overpower and dominate the neighbourhood like nothing else in Clifton. While the properties are claimed to enhance the sense of a "walled garden", the fact they tower 50 - 60 feet above the wall in many places creates more of a sense of a "walled city or fortress". Some have called it Stalinesque. In general, 2-4metre walls with a one or two storey storey structure previously behind them (not always solid but see through) now have 4 or 5 storey buildings proposed - rising up to 60 feet higher than before. ii) The flat roofs do not complement the pitched roofs of the Clifton roofscape but obscure them in places. In some cases, they also bring the tops of the buildings closer to the street and their neighbours creating a more domineering impact. iii) The height and proximity to the streets and other properties obscures the sky, plus key glimpses of mature trees and the historic buildings such as Clifton College which are so much part of the character of this historic neighbourhood. This is especially true on the South end of Northcote Rd where residents live and work and children study and play and walk to and from classes. It also clearly applies to views from Guthrie Rd. iv) The level of loss of sky and sunlight loss in winter for the hundreds of people who walk along Northcote Rd every day and live or work or play in many of these neighbouring properties will be substantial. It will create even longer darker winters that will surely be to the detriment of the hundreds of people affected, just when we are all at our most vulnerable. It is noticeable that the proposal is very sparse on images at street level. These would give a much better sense of what the potential impact of the proposed development would be. Many pictures are plans, aerial photos or simply, rather flattering sketches. A walk around the perimeter looking up easily shows the difference. Mostly, it is very hard to see how the proposal can be said to be "preserving the character" let alone "enhancing it". Elsewhere in Clifton, where buildings of comparable heights exist they are rarely directly opposite, so close to each other or so close to the pavements or thoroughfares. They are either at least 28 - 35 metres away from each other and set back from the pavements or they have many "look throughs". These elements help sustain and create a sense of spaciousness and sky that characterise the neighbourhood. The report summary Pt. 8.9 clearly states that the development will "increase the effect of urban closure," " provide increased visual closure of the local street views" and "substantial adverse</p>	
--	---	--

effects" for "private residential properties on Northcote Rd." Apart from the improvements of replacing some low quality buildings at the top of Northcote Rd, the only beneficial effects acknowledged in the report appear to be the few glimpsed views into the site through the proposed new access points. At best, these "positive" effects have been acknowledged as slight. The larger number of adverse effects in the report are either judged as moderate or substantial. The photos 37 -47 in the appendix provided in support of this judgment regarding the level of adverse effects experienced really do not give any accurate sense or feeling of the adverse impacts of this development - which are a lot more powerful than implied. The report suggests the adverse impact for Northcote Rd is moderate. Maybe this is partly because it states that this is a "strongly urban environment". However, despite some urban features especially at the North end this categorisation does not seem so true at the South end where the Victorian terraces and residential buildings are. Photo 42 does show that the lower end of Northcote Rd feels more suburban rather than urban as described in the report. This photo also shows that at least 30% of the mature greenery viewed from this location would be obscured by the proposed development - which is obviously an adverse impact. Clifton is a spacious suburb and the high levels of sky and visibility and mature trees visible throughout. These characteristics help it retain this spacious feeling even when more urban features are occasionally present. The increased height of the buildings and greatly increased sense of closure along Northcote Rd especially at the southern end of Northcote Rd will completely destroy this sense of suburban spaciousness. The report does however acknowledge the severe adverse impact and high sensitivity of the scheme for the residents of Northcote Rd at the South end. This makes it all the more surprising and disappointing that the proposal was not adapted in this respect, especially given the constructive suggestions made by the residents during the consultations for some appropriate height reductions and cut throughs. These were ignored, much to our considerable distress and frustration.

Environmental Concerns  
I am not an environmental expert but how likely is it really that several years of building works and demolition, uprooting over 100 mature trees, introducing 200 new homes, 400 new permanent residents plus 100+ cars is actually going to support or enhance the environment? I see the Tree Forum in a public comment has suggested that the Zoo's claim of an improvement in its sustainability is wrong and that there will indeed be a significant deterioration. I do not understand how such a unique 12 acres site, relatively undisturbed/stable for so long with so many mature and unique trees and vegetation habitats can be considered appropriate to redevelop in this way on this scale for so little housing and social benefit

Conclusions  
It is understandable that the trustees of the Zoo and their team of experts may feel they need to put in as strong a plan as possible so that they can maximise the potential profit for the site and so that they feel confident that they are not at risk of being sued for not fulfilling their fiduciary duties. However, the scale of this scheme proposed and the apparent disregard of almost all the valid major concerns expressed by the neighbourhood during consultations has been enormously disappointing and distressing. The omission of helpful images at ground level which could have been produced plus the volumes of omissions and errors in data presented need to be rectified and clearly presented and made available for all to see and understand. For a site of this size the detrimental impacts need to be better explained and understood. I believe the Council might consider an independent review or new reports for these items. If this current proposed scheme were approved, I believe the Zoo's legacy would be far from what it desires. While doing very little to address the crisis of affordable housing, the proposal

	<p>currently risks leaving an embittered darkened neighbourhood permanently diminished in many of its unique and precious qualities, surrounding quite a posh housing estate. The profit from approving the change of usage and this scheme would clearly benefit the zoo and the developers by millions of pounds. However, it would be at the direct expense of Clifton which would suffer years of massive disruption as the site was transformed for such a large project plus longer term enduring negative impacts of something that so clearly fails to preserve and enhance the character of the area in many important respects. Surely, if housing has to be approved, at the very least a much "lower rise" solution is required. This would benefit the internal zoo site residents as well as the entire neighbourhood. Alternatively, could the zoo and the Council give something like the OurWorld proposal a better consideration for a more fitting and suitable legacy for the benefit of the whole of Bristol? If this change of usage and the scale of this residential development were to be allowed by Bristol City Council now, this could be a massive, opportunity lost for this historic unique site, forever. This would appear to be for the sake of a few expensive dwellings benefiting a few hundred mostly quite privileged and affluent people, plus some profit for the property developers and some extra "windfall" millions which are desired but not actually required by the Zoo - which is a charitable trust. All of this would be at the expense of Clifton, its unique and outstandingly beautiful neighbourhood and conservation area and of no significant benefit to the remainder of Bristol. We all understand the reason for the loss of the Zoo which is a very sad loss for the city and the neighbourhood. It has brought much life and vitality and happy memories to so many for over hundred years and will be greatly missed. Surely, we all deserve something more fitting in its memory, than a large, overbearing, "rather posh housing estate".</p>	
--	---	--

92. O	<p>Dear Matthew As you are the Case Officer for the above, I am writing to ask for your advice and help regarding a number of matters concerning the Bristol Zoo Planning Application Ref. 22/02737/F and in particular, I have questions regarding the processes likely to be involved from now. I am a resident of 6 Northcote Rd and Chair of the Northcote Rd Residents Association. You will have seen various objections, concerns and fears expressed from different Northcote Rd residents, who are almost certainly the Zoo's residential neighbours potentially most adversely affected by the proposed development. This was acknowledged in the townscape assessment and to us personally, by the Zoo planning team. Our Primary Concerns Our concerns have been primarily based on the potentially overpowering, overbearing, overshadowing and intrusive impacts of the immediately adjacent proposed blocks of flats planned so high and so close to us all. In our particular part of the neighbourhood at the bottom end of Northcote Rd, the incongruence of the design and its scale and potential adverse impacts on the townscape in an historic conservation area plus the significant losses of daylight and sunlight, really are much larger than the planning application and some of its supporting documents imply. There is nowhere in this part of Clifton where such large-scale block of continuous modern housing development exists directly opposite other housing in such close proximity. We have been particularly concerned by the quality, limitations and implications of two documents supplied in the application: 1. The daylight and sunlight survey: acknowledged privately as a "dark art" by Geraint Jones the Savills surveyor, this was full of inaccuracies, with dozens of omissions and seemed utterly misrepresentative of the effects of the development. Some more but not complete detail about the levels of omissions and inaccuracy is contained in my personal, previously submitted objection. 2. The townscape and visual impact assessment: where the suggestion that this was all an urban rather than suburban landscape (only really true for some parts of the wall) and a few select photos in the appendix gave no impression at all of the impacts of the scale of this development in reality as experienced at ground level. For example, appendix photo 45 seems to imply that two mature trees and a significant amount of sky will not be obscured by the 5 storeys intended block, which they surely will be. Indeed, the overall planning application is very light in demonstrating this real ground and street level visual impact - using just a couple of highly selective sketches. This seems surprising for the most major development in Clifton for decades where surely everyone should be getting a much fuller and proper representation of the proposed outcome. Given the huge negative impact of these current planning designs on what I believe you call the "residential and visual amenities" of the residents of Northcote Rd, we are all very worried that decisions are now going to be made based on what we believe to be either inaccurate, substandard, biased or misrepresentative documents. And, although we know that loss of private views and property price losses are of no relevance to planning decisions, for some of us the potential adverse impacts in the current proposal are genuinely heart breaking. If implemented, they would seriously diminish the quality of our lives and our living. This would be true if we stay or if we leave after having incurred the costs of moving and the devaluations of our properties Our Questions We are exceptionally keen to know that the planning process will allow our concerns and our alternative viewpoints and/or documents to be properly considered. This is especially so given the undoubted potential scale of damage to our mental and financial wellbeing from these current plans. However, we freely admit we do not know how best to ensure this can happen. Are you able to advise us please? We have become increasingly worried partly because of what everyone feels has been a "sham tick box neighbourhood consultation" process by</p>	04-Jul-22
-------	---	-----------

the Zoo's team and partly because some of the documents commissioned by them seem biased and misrepresentative - perhaps unsurprisingly. In their clear pursuit for maximum profit, the Zoo planning team repeatedly seem to have shown almost complete disregard for the concerns expressed by neighbours on all sides of the Zoo including the West Car Park and Clifton College. If possible, we would like to know the following please: i) What is the process from here on in and where or how do we at Northcote Rd get our concerns properly explored? ii) What happens on the Monday 12th September determination date/what is the process? iii) What is likely to happen or could happen after this date? iv) Is there anything we could do privately in advance that would help/or we could do afterwards? v) Will there be another independent light survey commissioned? vi) Will there be a requirement to model ground level and street views of the development from inside and outside the zoo? Will they be independent? If so, who will pay for them? vii) Would it make sense for the neighbours to commission some of these services and if so, by when would they now be needed? Could we be given access to some of the Zoo's team data/models already built to help do this? viii) Would it be helpful to submit some more illustrative pictures and corrected photographs of the visual impact at ground and street level even if not terribly sophisticated? Would it be helpful to submit these with some constructive suggestions? ix) Would it be possible for you or a representative of the Planning Committee to meet briefly with us and literally see things from our points of view? And if so, when? (A late afternoon as the sun drops is quite illuminating!) In our experience, once people have seen the current heights of the proposed development in relation to the existing trees and buildings on Northcote Rd a short 5 minutes' walk is sufficient to reasonably visualise how (shockingly) overbearing the impact would be. This is all due to the combination of the proposed building heights and their proximity to the street. It is immediately obvious that huge amounts of sky and practically all glimpses of mature trees and of the historic buildings, plus almost all the late afternoon sunshine will be obliterated. It is these characteristics that give this part of the neighbourhood its character and keep it feeling suburban and spacious, despite some low-level urban features being present. Once these features or characteristics are lost, the Northcote Rd area becomes much more urban, more enclosed and quite a lot darker for much of the afternoon and early evening. Some of these elements were slightly acknowledged but in a very understated way in the townscape assessment.. In our personal instance at 6 Northcote Rd, the proposed outlook changes from looking at broad skies and trees stretching almost a mile away to simply looking at a 50ft -60 ft high brick wall just 66 feet away, with barely a glimpse of sky from any window - intruding and dominating all our key living and working spaces. To visualise this potential change is truly shocking and deeply dispiriting. It is a genuinely distressing experience I now have many times each day, every day since the planning application was submitted - after the last consultation we were all shocked by the absence of any fundamental changes. I would really welcome an opportunity for you to visit us so that you can so simply and easily visualise all this. The adverse impact here at this end of Northcote Rd is evidently many times worse and much more instantly visible than that of the West Car Park. Yet, if there were a meaningful conversation with the neighbours we feel these particular concerns might be reasonably addressed with some reductions in heights and scale or increases in distance in the right places. The Northcote Rd residents are not inherently opposed to plans for housing. However, we have become very upset by the Zoo's approach which has come across as feigning interest, feigning sincerity and feigning concern. They have proposed a scheme with almost complete disregard for



	<p>our clearly expressed key concerns and constructive suggestions and which is directly and very evidently at the significant expense of our own mental and financial wellbeing. The current application clearly seeks to maximise their profit with complete disregard and at huge direct emotional and financial costs to their direct neighbours. (They can only get an extra million pounds because we, collectively, lose a million pounds so to speak!). While we appreciate both the Zoo's needs for money and Bristol's needs for housing it is surely not the responsibility of the Council to maximise the profits for the Zoo, to the clear disadvantage of the existing neighbouring community. The legacy the Zoo's team are proposing to leave Clifton after 186 years does not currently appear to be either an inspiring or a happy one for its erstwhile neighbours. We are now very much hoping and relying on the Planning Committee to help address this matter fairly - obviously, with full regard to planning law and planning guidelines. We understand there are many stakeholders and demands including present housing needs and Zoo trustees to be taken into account. As the Northcote Rd residents who are directly adjacent, we have been acknowledged as the most adversely affected of the residential neighbours. We simply cannot see how the current plans for our neighbourhood can reasonably be argued to preserve and enhance the neighbourhood's character. More detailed examination and understanding of the significant reductions in daylight and sunlight plus the obliteration of almost all views of historic buildings and trees from within the terrace and at street level show the development would significantly damage the neighbourhood's character for us all and massively diminish the quality of very many more lives at our end of the development than it will ever enhance. We would like to be reassured we will be given a proper and fair chance of proper representation regarding our expressed concerns and we would very much like to understand how best we might achieve it. Any advice you can give will be greatly appreciated. Please do forgive the length of this letter. I know things are slow in August but given the pending September 12th determination date I would greatly appreciate your prompt acknowledgment of your receipt of this and welcome your response and advice as soon as possible, please. Many thanks and best regards</p>	
--	---	--

93. O	<p>As a resident of Northcote Road, I wrote in July 2022 and then again in November 2022 to outline some of my objections to Bristol Zoo's proposals for building large residential buildings on the main Zoo site. Since then our Northcote Road Residents' Association has received the final report from the professional organisation which we commissioned to carry out a light survey - outlining the light issues which would affect all eight of the houses in our road - caused by the planned building of the blocks of flats in such a very close proximity to our houses. You are most likely aware that the Zoo planners do accept that the houses in Northcote Road would be the most seriously affected by the new buildings so I hope that you will be making special note of the objections brought forward by Northcote Road residents. It is clear that the enormous height and form of the proposed buildings will have a more overbearing impact than I had anticipated. Despite some assurances given to us during several Zoom meetings with the planners, no significant adjustments have been made from the original plans - our suggestions have been disregarded. It is now clear that the proposed buildings will totally change the environment of all the dwellings here. Top floors will lose their views completely. The main living room in my flat, which I have long claimed to have one of the best views in Bristol, will lose this view completely as well as a significant amount of sunlight during the day. Flats and floors lower down within all six houses in Northcote Road will lose much more daylight of course. All of us living in this road are likely to experience a feeling of being enclosed by these buildings. I am not objecting to the principle of new housing being built on the main Zoo site (though I am very much more in sympathy with the "Save Bristol Zoo Gardens" campaign) - it is principally the height of the buildings proposed all round the perimeter which I object to. I should add that the actual loss of light and views to our homes has only become clear when I looked at the new visualisations that the Northcote Road Residents Association have commissioned. The Zoo's published images for what Northcote Road would look like are seriously misleading. In general, it is clear that more and more people living in Clifton, as they find out about the Zoo's plans, are realising that that the proposed flats would be totally unsympathetic and out of character with being placed in a Conservation Area. I urge you to reject these plans.</p>	04-Jul-22
-------	---	-----------

94. O	<p>I wrote on July 4th 2022 to object strongly to Bristol Zoo's proposals for building large residential buildings on the main Zoo site. I write as a resident of Northcote Road, immediately adjacent to some of the enormous blocks of flats being proposed. Since my last letter, revised proposals have been submitted by the Zoo. My original criticisms remain but I would like to make some additional comments. The Zoo has made the most minor and cosmetic of adjustments to their plans and these revised plans just do not address (at all) the concerns raised by myself and my neighbours. The plans for high density and totally inappropriately tall blocks of flats remain and the proposed development is quite clearly totally inappropriate for this conservation area. The visualisations commissioned by one of my neighbours show clearly the completely overwhelming impact the buildings will have. It is no exaggeration to say that they will have a devastating impact on the totality of the local environment - and not just where I live in Northcote Road. The massive block housing developments proposed - very close to the adjacent roads (some of which are very narrow) - are totally out of character with the environment of this part of Clifton. A few particular points arising out of comments made recently on the planning website (Summary of Design Changes and Revised Documents): - The planners have stated that the buildings opposite Clifton College are "in keeping with the local character". Having lived and worked within the buildings of Clifton College for 34 years, I assert that this statement is very wide of the mark. - I dispute the statement that "a traffic analysis demonstrates that the proposed development would generate less traffic than the average daily traffic associated with Bristol Zoo and would cause a reduction in local on-street parking". I have observed local traffic and parking in the area (Northcote, Guthrie and College Roads) for over 40 years (at all times of day) and, knowing the number of units of accommodation proposed and about the limited amount of parking which will be provided on site, I cannot accept this statement. - It is also stated that the noise during the construction phase is not being considered as part of the Noise Impact Assessment. I would suggest that it is vital that consideration of the noise impact during construction should be included as this will be of huge importance to local residents over a period of, I estimate, 5 years of clearing the site and construction of new buildings. The noise and general impact of such a large construction site - in very close proximity to many living spaces - is likely to be enormous and, I predict, is very likely to have a seriously adverse effect on the mental wellbeing of local residents, myself included. Finally, I would like to express great concern about the future of the Zoo's Education Centre (next to the Clifton College Music School). This was a new build just a few years ago and, as I have seen myself, it is a "state of the art" building able to be used for all kinds of educational purposes. As I walk past it each day, I can see that it is, thankfully, still being used. However, the proposed building plans have one of the large residential blocks in the place where the education centre now sits. This obviously means that the Education Centre will be demolished. This is nothing short of criminal - to destroy such a new and useful facility; a terrible waste of resources. I know that the Zoo plans to build a new Education facility at The Wild Place but this will cost a great deal of money and, being much further from the centre of Bristol, make it more difficult and costly for students to reach. This - and the elimination of the wonderful herbaceous border - are just two examples of the needless destruction that will take place if the Zoo's plans are allowed to go ahead. I urge you to reject these plans</p>	04-Jul-22
95. O		04-Jul-22

96. O	<p>As neighbours and members of the nearby school community, we are compelled to lodge our Objection to the Bristol Zoo Redevelopment scheme. While we are wary of change in the current status quo and community harmony, as well as expected construction inconvenience, we do accept that change is inevitable. However, we strongly object to the scheme as it stands. We have reviewed the scheme in considerable detail given the importance it has on the community around us. It is our opinion that the current proposal is superficial, paying bare lip service to the various stakeholder needs. It has clearly not paid due consideration to the effect that the construction of 200 dwellings will have to the complex tapestry of the surrounding area. Among many issues we have with the current proposal, our key objections are as follows: 1) Impact of road safety on surrounding area. Currently the area around College Road/ Guthrie Road/ The Avenue is relatively low density in terms of traffic, with most drivers requiring access only for the school and therefore considerate and sympathetic to the safety needs of students who are walking from different parts of the school. The proposed access points in the scheme cut through all of these roads and introduce traffic from 200 dwellings (including private cars and visitors to all of these homes, from service providers, delivery men etc) into an area where road safety is absolutely imperative. The scheme provides only 100 carparks which we believe grossly underestimates the true parking needs of a development of this size. The overflow parking will then flow through to nearby access roads thereby further jeopardising traffic and road safety. 2) Structures oppressive. The high buildings (5 storeys significantly higher than average nearby home) built on the perimeter of the site present an oppressive eyesore, ruining the open skyline of the area and preventing free flow of light. It also introduces privacy issues versus existing residential and school buildings that will be then looked into. Clifton is a beautiful, low density living environment. It commands a premium over nearby communities exactly because of serene and harmonious environment it offers residents. The sheer size of this proposal stands at odds with the architectural and community needs of the area. There is inadequate infrastructure to support 200 new dwellings and the proponents of the proposal has failed to think through the full impact of what they have submitted. Their proposal fails to inspire any confidence that they have deeply considered the complex range of competing needs in the area and are committed to ensure the continued harmonious of life for everyone around the area. We therefore strongly object to the current proposal.</p>	04-Jul-22
97. S	<p>Having lived and worked in Clifton for many years I am writing in support of the planning application for the redevelopment of the Zoo site to provide a residential development with associated amenities. It provides the city with much needed housing, including provision of affordable housing. Furthermore the development is sensitive to and protects the history and landscape value of the site. Public access will be retained and a conservation base for the Clifton and Durdham Downs will be provided at the current main entrance. This is a carefully planned and designed development which has my support.</p>	04-Jul-22

<p>98. O</p>	<p>Having read the updated design documents there are no material changes to alter such an inappropriate development for the site, in particular the over sized "blocks" of flats, so there is still some obvious areas where significant changes and improvements must be made. Key issues; - Height of development not in keeping with surrounding buildings &amp; conservation area - Loss of a unique amenity for the whole of Bristol in a unique and irreplaceable site/area - New buildings because of significant height increase will overlook into school areas - New buildings because of significant height increase will mean loss of light to existing properties - Negative visual impact on existing buildings close by of significant architectural appeal - Road safety and traffic impact on what are already congested small city streets (all of which surrounding the site are in effect single track), with significant pedestrian use by school children - Allowance of public traffic/cars onto the site for the first time in its history seems wholly inappropriate - Limited access to the site/gardens for the public Bristol &amp; the Zoo should be leaving a far better legacy on a site that has sustained them for 200 years - the current scheme's approach appears to be simply squeeze as many units on the site that they can get away with, rather than leaving a legacy that is appropriate for both Bristol, Clifton and the Zoo. Whilst I understand and support the need for more new homes especially affordable in our city, adding 201 homes is very minor. Also I note 80% of the properties proposed do not need to be "affordable" so I'm sure will some be the most expensive properties in Bristol in terms of price per square foot - therefore I believe this scheme in its current form is wholly inappropriate and I hope will be refused until a scheme is proposed that befits this wonderful site and our city. We will only get one chance at getting this development right so please reject this scheme in its current form!</p>	<p>04-Jul-22</p>
--------------	---	------------------

99. O	<p>Having read the design documents as well as comments made by others, there are some obvious areas where significant changes and improvements must be made. Key issues; - Height of development not in keeping with surrounding buildings &amp; conservation area - Loss of a unique amenity for the whole of Bristol in a unique and irreplaceable site/area - New buildings because of significant height increase will overlook into school areas - New buildings because of significant height increase will mean loss of light to existing properties - Negative visual impact on existing buildings close by of significant architectural appeal - Road safety and traffic impact on what are already congested small city streets (all of which surrounding the site are in effect single track), with significant pedestrian use by school children - Allowance of public traffic/cars onto the site for the first time in its history seems wholly inappropriate Bristol &amp; the Zoo should be leaving a far better legacy on a site that has sustained them for 200 years - the current scheme's approach appears to be simply squeeze as many units on the site that they can get away with, rather than leaving a legacy that is appropriate for both Bristol, Clifton and the Zoo. Whilst I understand and support the need for more new homes especially affordable in our city, adding 201 homes is very minor. Also I note 80% of the properties proposed do not need to be "affordable" so I'm sure will some be the most expensive properties in Bristol in terms of price per square foot - therefore I believe this scheme in its current form is wholly inappropriate and I hope will be refused until a scheme is proposed that befits this wonderful site and our city. We will only get one chance at getting this development right so please reject this scheme in its current form!</p>	04-Jul-22
100.	<p>This proposal has my full support and looks to be exactly what is needed in this area to support the ever growing need for new housing in Bristol. Looking at the designs I am excited to see that the gardens will remain open and become free to visit. As a local resident this will be a major draw for me and I am pleased that so much work has been done to retain this space as a biodiverse haven for wildlife. The buildings themselves look fine too. I've read several comments here bemoaning them but frankly I think that they look fun and functional. The main focus should be, in my opinion, on the gardens themselves - not the buildings and so creating a spectacle with the buildings was not the right direction to go. My only hope is that the final buildings are made from a material that fits in with the surrounding architecture in terms of it's colour - e.g. to match the light coloured stonework found in this part of the UK. I think that the zoo have done a brilliant job with these proposals and want to express that there are many in the local area that feel the same way. We understand the need for them to move up to Wild Place and wish them every success in the future.</p>	04-Jul-22
101.	<p>I fully object to this application. There are many safety issues in respect of vehicular conflicts with dropping and picking up children from neighbouring school. More housing means many more cars in this area causing environmental issues. The proposed buildings are not in keeping with this conservation area.</p>	04-Jul-22

102.	<p>Key issues, Loss of light. Height of proposed complex that will negatively impact on nearby buildings. The character of this area will be dramatically and negatively affected. Five years of building work will cause immense disturbance and pollution to nearby surrounding areas. My family and I live in a basement flat on Northcote road. To have this complex built on our doorstep will impact our lives negatively in practical and emotional ways. Our kitchen which is our main living/working area looks out on to a well tended courtyard and above that is Northcote road. We do not have a huge amount of light but we do have some open sky. This proposed complex will dramatically change our view of that open sky to one of concrete blocks. Our courtyard is used throughout the spring and summer months as an extension of our living space. This proposal would mean being overlooked by looming blocks and the loss of light would almost certainly affect what is now a mini eco system of plant life and habitats to countless insects. I cordially invite anyone from the planning committee to join me for a cup of tea or glass of wine in my courtyard to see for themselves the impact that these proposed buildings would have. My son's bedroom is the ground floor of the building which looks directly onto the pavement of Northcote road. Partial shutters keep this room private but with enough light. The proposed buildings would overlook his room and are so high it would mean an almost complete exclusion of day light and take away his privacy. Many people live in Clifton because of the atmosphere that beautiful Victorian and Georgian houses create. More often than not this means apartment living with all the minor inconveniences that come with converted flats. Building this amount of new blocks in the middle of a conservation area full of victorian villas and houses shows a disappointing lack of regard for the character of Clifton. Five years of building work on this scale would create huge amounts of pollution for residents, the natural environment and more especially, children. Cement is one of the worst pollutants in the world in terms of health and the environment. This is a terrible legacy for the zoo to leave behind.</p>	04-Jul-22
103.		05-Jul-22
104.		05-Jul-22

105.	<p>It is acknowledged that the re-use and re-development of a facility that was originally developed and evolved over many years for a specific use is challenging. However, that does not mean that the scheme as proposed is acceptable. There is significant concern with the proposed quantum and scale of development, the poor quality of the architecture, the site layout and the adverse harm that would be caused to the character and appearance of this part of the Clifton and Hotwells Conservation Area and the setting of the listed buildings. This is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over intensive with a consequential poor relationship with the adjacent School and its listed buildings. The north building at 6 storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular, the Bear Pit would be overly dominated by new development. There are concerns with the impact on retained green infrastructure. Particularly with regard to the buildability of the quantum of development whilst retaining the specified trees. There are significant questions over the long term maintenance of the proposed public space. The gardens are a locally listed heritage asset. The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site. Consequently, it is considered that the proposal would neither sustain nor enhance the significance of relevant heritage assets including the Conservation Area and listed buildings within and without the site. It would provide insufficient substantial public benefit to outweigh the substantial harm caused by the impact of such a poor scheme on the relevant heritage assets. It is not considered that this scale of development can be justified in a heritage context. Moreover, it accords with neither the relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported.</p>	05-Jul-22
106.	<p>An interesting historically important site kept futureproofed with sustainability and accessibility in mind enabling a world leading zoo to thrive and survive aiding conservation and education.</p>	05-Jul-22



107.	<p>I wish to lodge in the strongest terms my objections to the proposed development of the Zoo and its large gardens. The proposals will transform this unique and tranquil area, which is close to so many historical and attractive buildings into a mundane, dreary and unappealing neighbourhood so similar to other developments throughout the country. The area of Clifton has been designated a Conservation Area precisely for that reason - to protect it from developments like the one being proposed, so that it can remain unique. The continuance of Clifton as an area of architectural beauty is at a grave risk of being ruined after a long period in which local residents, and with the support of the town planners had taken steps to preserve its existence. The scale of the buildings as well as the modern style will dominate and instantly spoil the entire area and will especially dominate the properties in Northcote Road, College Road and Guthrie Road and the architectural beauty of the buildings of Clifton College. The building of houses within the zoo gardens will be detrimental to the open feeling that the gardens currently enjoy. Development, if any, should be restricted to the conversion and conservation of existing buildings in order to preserve the character of the gardens. Furthermore, the 'planting' of a densely populated area will inevitably lead to even more pressure for residents, the staff of Clifton College and the staff and patients at the nearby Pembroke Road surgery in competing for parking spaces with the residents and visitors to the new development. The parking situation will only be exacerbated with the development of the Zoo's West Car Park which is also being overdeveloped. The College uses the area outside the Zoo in Guthrie Road for coaches on a daily basis to transport students to their sports grounds. Presumably this will no longer be possible if the development proceeds.</p>	05-Jul-22
108.	<p>I live in Clifton and am a Zoo shareholder. From 2000 to 2005 I was chairman of the trustees of Bristol Zoo. I support the Zoo's proposal to redevelop it's Clifton site to include residential units, in order to facilitate the Zoo's transfer to a much larger site at the Hollywood Tower Estate, which borders Junction 17 of the M5 motorway.</p>	05-Jul-22
109.	<p>This would heavily impact the safety of the children of Clifton College.</p>	05-Jul-22
110.	<p>My objections to the planning application 22/02737/F are in relation to the impact on Clifton College and Local residents: Highways safety concerns, in particular concerns in relation to the potential for vehicular conflicts with school drop offs/pick ups and with the movement of children along Guthrie Road, Northcote Road, College Road and The Avenue; Concerns around the potential for overlooking into the school grounds and buildings; Impacts on the setting of school buildings which comprise important heritage assets as well as impacts on the character and appearance of the Conservation Area; Any daylight/sunlight impacts on school buildings; Concerns around how construction would be managed and any impacts this may have on the operation of the school.</p>	05-Jul-22

111.	<p>I note that most of the support for this application comes from those who do not live within close proximity of the Zoo, and are therefore not directly affected by these proposals. As a resident of Northcote Road, I am one of very few residents whose immediate living environment will be changed for the worse should the development go ahead as proposed. Living on the ground and lower ground / basement floors, the light entering my property and the general visual amenity will be badly compromised by buildings ( E2 and E3 ). These two disproportionately large and close blocks represent a very small proportion of the total scheme, which the Zoo and its architects could have easily adjusted - and could still - to avoid blighting the homes of us neighbours in Northcote Road. These would be new, oversized constructions looming over the street and our properties, and changing the character of the only length of Northcote Road which is currently open and 'airy' and which houses residents. The lego-brick, squared-off, monolithic design of the these blocks, the lack of detail and finesse in their appearance, the overwhelming impression of blank, flat, monotonous facades with dead-eyed windows - all of this would completely alter the feel and atmosphere of what is at present a neighbourhood with architectural interest and variety and character on a human scale, and with natural greenery visible from outside the Zoo. Such a precious, unique site in this beautiful, highly valued and high-profile area of Bristol and the South West should be able to be enhanced, not degraded, by any new development. Since the second World War, too many poor quality, shoddily designed, crassly ill-suited and inappropriately located buildings have gone up in Clifton, as in so many parts of Bristol. There were perhaps understandable reasons for some of them, but there are no good reasons to contemplate the imposition of crude and unimaginative architecture, in this day and age and in a location where housing commands such premium prices, and when the Zoo's management promised faithfully to leave local residents, and indeed all Bristolians, a worthy legacy. What is proposed would, unaltered, certainly not offer that.</p>	06-Jul-22
112.		06-Jul-22
113.	<p>The revised plans have done nothing to improve the overall hideous size and appearance of this proposed development. The huge blocks of flats on the perimeter of the site are just not in keeping with the conservation area that the zoo has been part of. No consideration has been given to the affect these blocks of flats will have on existing adjacent properties . My original objection of the 6th July 2022 still stands.</p>	06-Jul-22

114.	I am objecting to the proposed redevelopment of Bristol Zoo Gardens for the following reasons 1 An unacceptable number of over 200 residential units in a relatively small site putting strain on local service provision 2 Rediculously high apartment blocks on all of the zoo site boundaries affecting the character of the conservation area and both light and privacy issues to properties adjacent to the zoo site 3 Insufficient parking provision on the site for the number of dwellings which will affect the neighbourhood despite the zoo's assurances 4 The planned loss of a number of mature tree specimens which despite new planting will take 50 plus years to replace 5 Increased background noise from the planned extensive use of heat pumps 6 The zoo says it cares so much for the environment and the animals in it . What about the humans that have to live with the environment that they leave as their legacy ?!	06-Jul-22
115.	This sounds a wonderful plan for Clifton. It will add much needed housing and benefit for local people. I support this application in every way. The Zoo will continue at the Wild Place project and will be a bigger and better Zoo for Bristol	06-Jul-22
116.	Long term economical affects of replacing culture with residences means a temporary gain for property owners at the cost of future generations who inherit what is left of local industry. Local communities will become even more divided, closing locations that open conversations is a sure fire way to create more anxiety and hostilities. This furthermore removes safety and independence from your kids. Their development and reliance on you and your time driving them to these places will stifle their intrigue and willing to challenge themselves. The more cars you introduce into cities the more isolated those walking the streets feel. To summaries - you will temporarily increase the wealth of property owners at the cost of your children's future, their ability to take control and believe in their abilities. The gardens should revisit their price plan - free to enter model with additional transactions/subscriptions/season passes being available with green workshops. "In Britain, any piece of land left undisturbed will first be colonised by small plants, then shrubs and then trees. After a hundred or so years, it will become mature broadleaf woodland - and, having reached that steady state, will remain that way for ever - a state known as "climax vegetation". 'Why is Britain so bad at planning cities?' - The Guardian, David Rudlin 2019	06-Jul-22

117.	<p>Blank, uninteresting, monotonous, crude, oversized, over-tall, incongruous, insensitive, inappropriate: all of these terms describe much of what is proposed in this application, specifically the blocks ( the word is sadly apposite ) of flats running around the major part of the perimeter of the development. As a resident of Northcote Road, I am being asked to accept a significant reduction in the light entering my home, which consists of the lowers floors of a house; moreover, the general visual amenity of the road and the immediate neighbourhood will be severely compromised. What is proposed will have the feel of a gated development, one that looks inwards and presents a grim, blank face to its immediate neighbours. The perimeter blocks are far too high, too many and too crude in design to represent anything close to the worthy legacy promised by the Zoo management. The greenery currently visible from outside the Zoo will be almost totally obscured by the blocks. The only reason the walled enclosure of the Zoo as it is at present is not oppressive is that trees and some interesting buildings can be seen from outside over wall that are not too high. These blocks will impose a grossly different feel and impression to close residents, locals and visitors alike. Surely, in such a unique, high-profile, iconic site Bristol can create something better.</p>	06-Jul-22
118.	<p>Whilst i appreciate that the site needs to be developed, i am extremely concerned over the proposed height of the development running alongside Northcote Road. It will mean that my flat will loo directly at a newly developed dwelling and this will not only impede on my privacy, it will also impact on the overall value of the property. The proposal for over 200 dwellings is likely to cause an increase in traffic to the area and, this is already quite saturated. I have concerns that the small, local road infrastructure will not be able to cope with such an increase. I would like the Council to consider reducing the height of the proposed dwellings that overlook Northcote road and also moving them further away from the edge of the proposed development. This will enable a greater level of privacy for all concerned and also a better proliferation of natural light for the residents of Northcote Road, some who live in basement dwellings and where natural light is scarce. Thank you</p>	06-Jul-22

119.	<p>Dear Development Management Team, We would like to put forward the following objections to the current planning proposals for the Bristol Zoo Site. We believe that in its current form it will have a significantly detrimental effect on the neighbourhood and the local area, which is an established conservation area. We live in a basement flat on Northcote road, directly opposite the East wall of the Zoo. Being in a basement flat we have limited natural light, especially past midday. The current proposal of building a 5-storey block (E3) as close as possible to the boundary wall and a 4-storey block (E2) directly opposite our flat will completely change the quiet, neighbourhood feel of the already narrow road. It also means that we will receive more than 20% less light in the winter months, with the daylight and sunlight report stating VSC values as low as 0.72 of our former levels; well below the BRE guidelines. Our privacy will also be affected as we will be directly overlooked by balconies and windows in our street-facing bedroom. When less than a quarter of the perimeter of the site lies opposite residential properties, we ask why it is necessary to build to such heights in these areas; it will have a significant impact on your nearest neighbours' quality of life and is incongruous with the existing architecture. Parking is already limited on Northcote road and it is regularly used by parents picking up and dropping off their children from Clifton college, the School and the nursery at all times of the day. The suggested proposals (see drawing 3392 09B) will remove more than 50m of available parking spaces which are already at a premium in the area. The use of Northcote Road as a primary vehicular route of access throughout construction and onwards makes me concerned for the safety of the many pedestrians, including school children who regularly use Northcote and the surrounding roads to travel between school buildings. The aforementioned building heights on the periphery of the site also raise safety concerns about overlooking residential school buildings. Whilst we recognise the need for new housing in Clifton and Bristol and welcome the retention of the bristol zoo gardens as a publicly accessible site, this proposal only offers 20% affordable housing and will negatively affect the quality of life of existing residents. We ask for more consideration to be shown to the welfare of residents, the school and the existing architecture. Yours sincerely, Dr J Hendry and Miss H White</p>	06-Jul-22
120.	<p>We are writing to state a full objection to the plans proposed by the Zoo, for redevelopment of the site to include excessively tall and unsympathetic residential units around the perimeter. As previous residents of 5 Northcote Road, we feel very strongly that the proposals would severely and negatively impact the current residents and the historical character of this Conservation Area, irrevocably. The plans show an absolute disregard for the Zoo's neighbours and to this area of Clifton as a whole. If the Zoo were to leave such a deplorable legacy, it would be sad indeed.</p>	06-Jul-22

121.	<p>I am objecting again to the proposed development as it contravenes the Bristol Development Framework Core Strategy Policy BCS22 by failing to 'safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance', namely the site of Bristol Zoo Gardens. The modifications to this Application are minor and are clearly contrary to BCS 22. The proposed development is over intense, unsympathetic to the period and style of the adjacent buildings and negatively impacts them. It will adversely affect this part of the Clifton Conservation Area and the setting of its listed buildings, views shared by Bristol City Council's Conservation Advisory Panel. The National Planning Policy Framework states that heritage assets should be sustained and enhanced and that 'great weight should be given to the asset's conservation' (para 199). It continues that 'local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.'(para 206). This proposed development does not ensure this or meet these criteria. There is a shortage of affordable housing in Bristol and it is very disappointing that the provision in this scheme will be reduced by half so that the work can start more quickly and a greater number of non-social housing residents can cover the ongoing costs of the long-term maintenance of the site. This appears to be a back handed way of reducing the affordable housing provision which obviously does not generate the level of income that the other units might do. This approach is both short sighted and short-termist. The issues caused by traffic from the 196 proposed units will severely impact the area around the site. It is naïve to expect that residents will not have cars and those numbers are likely to be higher than the numbers suggested by Bristol City Council's calculations. The area already has traffic issues at school drop off and pick up times. It is also an area that is frequented by school children throughout the day. The amount of traffic that this development will produce will lead to it being unsafe for school children (4-18 yrs olds) to circulate during the day. The views of Northcote Road as submitted on 13 January are very deceptive. They present Northcote Road, with the proposed development, as light and airy. The road is not like that now even on a bright, sunny day. The views also omit to show the southern end of Northcote Road with the extreme height and massing of building E3. The views presented by the developer are misleading and misrepresentative and do not clearly show the effects of the height and scale of the proposed development. Building E3's height and location has not changed. It remains domineering and overbearing. Its scale and height dwarfs the other buildings in Northcote Road (see doc. BZG-PPA-ZZ-ZZ-DR-A-2602-PL1) including no 1 and no 2 Northcote road, both tall, substantial Victorian houses. Building E3 is significantly taller (8m measured to the eaves) than these and will block more light from Northcote Road due to E3's extreme height. The overall massing and scale of the proposed buildings on Northcote Road need to be reduced to ensure more light reaches Northcote Road and for reasons of safeguarding as they look directly onto the school and a number of its boarding houses. I strongly object to the proposed development in its current form and ask that it is rejected by the Planning Committee.</p>	06-Jul-22
------	---	-----------

122.	<p>The revised proposals have minimal changes. The interior of the flats has been amended, but little change has been made to the heights and massing of the buildings. This is a particular issue for Northcote Road and Guthrie Road where five to six storey buildings are proposed where currently the buildings are three to four storeys high. The development does not reflect the existing architecture or the historic nature of the site and area. The number of dwellings across the site will also have a significant impact on the amount of traffic in the area and on road safety, both during the construction phase and thereafter. Whilst I understand that this is an opportunity for the Zoo to safeguard its long-term future, it is very disappointing that the proposals are less than sympathetic to their surrounds and that little consideration has been given to innovative and thoughtful design and how it can sit well within a Conservation Area. I therefore strongly oppose this development for the reasons listed above and in my original objection of 6 July 2022.</p>	06-Jul-22
123.	<p>I am objecting to these proposals as a parent for the following reasons: 1. Road Safety. I have serious concerns about road safety as the scheme is in close proximity to a large school consisting of both day and boarding pupils. The pupils are obliged to move around their campus to access different classrooms, sports fields etc. and the proposed scheme will cause an increased level of traffic, both during the construction phase and afterwards. This will jeopardise the safety of children moving around their school site. The entrances proposed for Guthrie Road and Northcote Road will have a particular impact as they are two of the main areas where parents pick up and drop off children. At peak times, there are already traffic jams, poor parking and bad driving and this will only be exacerbated by an increased number of cars. Entrances here are likely to significantly increase the risk of accidents to school children. 2. Parking. The scheme proposes 201 dwellings with 120 car parking spaces. This will not be enough parking spaces. While it is desirable and necessary to reduce car use, the reality is that most households have at least one vehicle. Where are these extra vehicles going to park? Again, the impact of this is increased traffic on the roads around the Zoo looking for parking spaces and once again, there will be an increased risk to children's safety. 3. Design. The design of the buildings is poor and lacks harmony in relation to its site. The surrounding Conservation area and the buildings adjoining the site consist of detached houses and imposing, listed school buildings broken only by trees and green spaces. These bear no relation to the proposed scheme which does not sit comfortably in this context. The buildings are too tall, overbearing and constitute a solid mass with no redeeming features. Inspiration seems to have been Stalinist Russia with a few plants added, perhaps to soften the corners, or to allude to the listed gardens that once occupied the site. The scheme does not reflect or relate to the pink sandstone of the neighbouring buildings, nor does it relate to the materials and colours of the Zoo's perimeter wall. Its sits in ugly contrast with its surrounds and will be an eyesore that is likely to date quickly. The new buildings are concentrated around the perimeter of the Zoo's site causing neighbouring houses, school playgrounds and boarding houses to be completely overlooked. In some instances, the new buildings are taller than the existing houses and the school being overlooked is a safeguarding issue. Will all the windows overlooking the school have opaque or frosted glass? This scheme is an opportunity to develop an historic and much-loved Bristol site. It is an opportunity to come up with innovative and thoughtful design, showcasing how a contemporary development can enhance a site bound by Conservation Area</p>	06-Jul-22

	<p>regulations. This scheme fails on all counts. It is pedestrian, lacklustre and is missing the vision and thoughtful consideration given to the historical context and site surroundings in local developments, such as the ss Great Britain and Wapping Wharf.</p>	
--	---	--



124.	<p>Bristol Zoological Gardens are hallowed ground in this city. They have an intangible magic that you feel when you move around them. Trees and flowers, gardens astonishingly mature, verdant and lush. And wildlife. Exotic wildlife. You're in the middle of Bristol. You're also in Eden. If the Zoo's current proposal gets planning permission and goes ahead, the iconic herbaceous border will become someone's multi-million pound private home and garden in around 5 years time. And until then, this unique slice of paradise, 186 years of historic fabric, woven into the heart of the city, will be a building site. And afterwards, it will never be the same again. A phenomenal juxtaposition of natural and urban, of people and wildlife; Bristol Zoological Gardens are unique. Bristol Zoological Gardens are a jewel in the crown of this city. They are 186 years of the natural world, history and collective memories contained within a 12 acre site in the heart of a city. Once they are sold off to a private developer to be turned into housing, they are gone for ever and not coming back. Why This Shouldn't Happen The corporate message being pushed very hard by the Zoo's management and supporters for their proposals are; "Much Needed Housing" If more homes are so necessary in Clifton and Bristol, why not start building on the Downs, our city parks, Ashton Court or Blaise Castle as well? Surely we can all agree that some places are just too important and valuable - in a strictly uneconomic sense - to be turned into housing estates? 'Affordable' housing 'Affordable' is a relative term. This site will be a luxury housing development when you do the maths and the 'affordable' housing will undoubtedly still prove to be well out of reach for most first-time buyers. Free Public Access To The Gardens If you look at the Zoo's plans, only about 20% of the site will be available to the public and approximately 42.5% of the existing trees will be removed as will the herbaceous border. If the Zoo's plans go ahead then the site will be owned by the developer and the 'free' public gardens will be paid for by an 'Estate Service Charge', paid for by residents. Whether it is in 5, 10, or 20 years time, it seems inevitable that residents will tire of their substantial service charge paying for the upkeep of public gardens and ultimately, they will close to the public. When asked directly, the Zoo can offer no guarantee that the gardens will stay open to the public in the long term. The Zoo says with a smooth sale, it envisages the gardens being closed for approximately 5 years. Taking into account potential and long planning delays - we could be looking at the site being closed for up to 10 years with much of that time it being a building site. 38% increase in the biodiversity of the site This assertion has been strongly challenged by the Bristol Tree forum who say; - An unworkable version of the metric for Biodiversity Net Gain (BNG) has been used (BNG 3.0) for calculating Urban tree habitat. BNG 3.1 fixes this and should be used instead. This shows that the trees growing on the site account for over 70% of its biodiversity. - The applicant's proposals will result in a net 22% loss of biodiversity rather than the 38.6% gain they have stated. When you look at the disparity between the public rhetoric and the detail, one can only draw the conclusion that the Zoo are trying to shoehorn their proposal through planning and are intentionally obfuscating the full details from the wider public. Accessibility If you currently want to visit the Zoo and live in Bristol, it is very easy to walk, cycle, get the bus or scoot. And if you live outside of Bristol, a train to Temple Meads and then the No. 8 bus up to Clifton is also very straightforward. The reality is that Cribbs Causeway is relatively inaccessible and not especially inviting if you live in the city and especially if don't have a car, which is widely encouraged in this day and age. Next to no one will be walking to Cribbs Causeway and very few will be cycling or scooting. Whatever the Zoo may hope, there is no question that the vast majority of people who will visit the Cribbs Causeway site - as they do now - will arrive by car. (Look at The Mall</p>	06-Jul-22
------	---	-----------

	<p>where almost all visitors arrive by car). This seems entirely at odds with the Zoo's target to become carbon neutral by 2035. Beyond Economics Bristol Zoo's presence in the heart of Bristol, genuinely means something to the people of this city. You can put a £40m price on the value of the site, but you can't put a price on giving many more generations of young people the proximity to wildlife in the heart of their own city. Conclusion I believe that if the Zoo chose now at this late stage - which it has not done so far - to meaningfully engage with the enthusiasm and goodwill of members, visitors, the wider public, the history, the memories, the possibility for change, the potential for restructure and development, for new investment, what its presence in the heart of the city means to people, it seems extremely likely that they would conclude that they cannot afford, not to keep Bristol Zoo open. Although the Zoo's management and trustees may be concerned that changing course at this late stage would appear weak and no doubt be rather inconvenient, I believe it would show great strength of character and history would remember and thank them.</p>	
125.	<p>I have placed several objections to these plans over the previous months. To my mind mismanagement of the Zoo's aims top my list, followed by inappropriate financial greed, inappropriate architectural dreams, and inappropriate hectoring of those involved with the outcome of traffic planning, amongst others. To those who have taken issue with Clifton College for fighting the planning application I ask; isn't taking care of No. 1 exactly what the Zoo are doing? Bristol Zoo Gardens are approximately 30 years older than the original Clifton College buildings. If Clifton College Chapel, and perhaps other buildings on the campus, is designated as a Grade 2 building by English Heritage could it not be feasible for Bristol Zoo Gardens to become part of English Heritage, Landmark Trust or National Trust to preserve what has been known for generations?</p>	07-Jul-22

126.	<p>I object most strongly to these proposals. Could I be thinking, possibly, that greed, misappropriation, misjudgement are involved? The artists' impressions of how the Bristol Zoo Gardens will look when completed are just an idealised utopia. Don't be seduced- in practice, the realities will be very different. Will the Conservation Hub actually include details of the surrounding conservation area outside the Zoo gardens? I think not. In theory there will be two kinds of people who will live in what is proposed- this who are able to afford what is on offer, and those who are unable to do so. There will be resentment between those who can and those who cannot. I have been unable to come to terms with the 40% of 'Affordable Housing' in this setting, therefore, for those who, like me, are not sure what this means, I recommend two pieces of reading. One is the entry posted on the 15th. July named 'Housing Enabling' and the other on the internet by The Bureau of Investigative Journalism on 'Affordable Housing'. There are approximately 20,000 names on the Bristol City Council's and surrounding areas waiting for 'Social Housing'. In the 1980s Margaret Thatcher's Government introduced the 'Right to Buy' for those in long term tenancy agreements, and some 2,000,000 Council owned properties became privately owned at a heavily subsidised Government rate. Less than 5% have been replaced by new builds. So why has Boris Johnson stated publicly that he intends to extend the scheme? Council/Social housing has always been, and will continue to be, a badly needed source of housing, especially as the population increases at an exponential rate. But, please, not in the Zoo's new build, even though inclusion of 'Affordable Housing' is compulsory. Therefore the whole scheme should be stopped in its tracks with immediate effect. No trees should be felled or damaged in whatever happens in the Zoo Gardens. The gardens themselves that will be open to the public will be a magnet for those aimless individuals who sit around drinking alcohol and leave their discarded containers for others to dispose of. The plans include a grand plan to save the Bear Pit and the Raptor Aviary. These are wild creatures that need to roam. I do hope that the Polar Bear Corner will not be saved. To see the Polar Bears in their confined quarters rocking their heads from side to side as a result of their madness was pitiful. They were shot, as I recall. I would like to see local billionaires offering a substantial collective amount to the present Zoological Society so that The Wild Place Project can go ahead but to leave the present Zoo Gardens and Car park without the shameful blocks of flats and new builds. Surely, in this day and age, an agreement along these lines could be mobilised? The present planning application is a disgrace and needs a radical rethink. It is not fit for purpose.</p>	07-Jul-22
------	--	-----------

127.	<p>Should one drive from Cribbs Causeway, past Westbury on Trym and up Falcondale Road onto Westbury Road, there appears before one's eyes beautifully constructed buildings in what is a familiar red stone. At White Tree roundabout the Downs open up to the right whilst on the left are the buildings that used to be St. Christopher's School. That view continues until Spire Hospital at the top of Blackboy Hill. The houses there are just the frontispiece for Henleaze, Redland and Cotham, mostly in the locally quarried red stone. Turning right at the top of Blackboy Hill takes one onto Downs Road, and the commencement of more beautiful red stoned houses down Pembroke Road, (the only exception being called euphemistically 'Paddy's Wigwam'), and then The Avenue with Clifton College Prep School in red stone. And the The Zoo. Approaching Bristol from the Long Ashton Bypass one has the splendid view of the Crescents overlooking the river and harbour. Along the Portway there are no houses as such until one turns right up Bridge Valley road. At the top, on the right, is Canynge Road which leads into Clifton, but on the right there is a building called The Mansion House, and a substantial row of houses that, again leads to Clifton. What a splendid sight those red houses are. And then the Zoo. I have been familiar with what I have described for seventy odd years. I am dismayed to find the plans for the 'refurbishment' of Bristol Zoo gardens are not in keeping with what I have described, but more of mass habitation out of kilter with the conservation area surrounding it. The tall blocks on the perimeter of the zoo, with animals depicted, will be an eyesore, and once winter arrives with lights on in the windows and the heat pumps operating, they will appear more like a cruise ship at sea. So, with that in mind, I suggest that the planners insist on funnels being included in the plans and the whole being called, 'SS Clifton Encore'.</p>	07-Jul-22
128.		07-Jul-22

129.	<p>As a near neighbour of Bristol Zoo Gardens, I have been affected negatively and relentlessly by every stage of the development proposals. Our contact with the "zoo committee", both through Zoom and at gatherings, has been politely restrained, always cordial, but frustratingly fruitless. The suggestions that my neighbours and I have raised with "the committee" have only been addressed marginally with the most minor tweaks here and there, the overall modifications to our requests being superficial and barely perceptible. The big picture remains much the same as it always has, with structures of 4, 5, and 6 storeys looming high and at close range. 1. The key complaint is the excessive size, scale, bulk and massing of the proposed development in close proximity to our homes as well as dominating this Conservation Area. Besides dwarfing our residences, the immediate area will suffer as the surrounding suburban roads are reduced to shadowy canyons - and the shadows will be undeniable. The considerable pedestrian 'traffic' on the pavements, especially for younger pupils, will no longer enjoy full daylight in the shrouded route - nor will visitors to the proposed park within. 'High Rises' will smother this neighbourhood beyond recognition. 2. Computer generated images produced by the zoo are comical in content, verging as an insult to our intelligence and our familiarity with these perimeter roads. Mature trees appearing immediately inside the zoo wall do not presently exist, nor would they reach such a stage for another 50 years. Furthermore, given their proximity to the projected buildings, there is no way in which they could survive and provide a shield to buffer the current residences. 3. The modernist monolithic architecture would be more appropriate in an entirely different setting or cityscape, not in a residential Conservation Area consisting of listed buildings and handsome Victorian homes whilst also abutting the classic setting of a prominent school and its impressive campus. Sight lines will have clearly been violated in multiple locations. From street level, gone are the glimpses of trees and the abundant daylight. Equally so, gone are a large proportion of mature trees within the 12 acres, all of which enrich the healthy well-being of this area. The artists' impressions take great liberties in distorting reality of the scene. 4. The towering height of these overbearing Blocks of Flats would adversely affect and diminish the daylight, directly and indirectly, onto properties, pavements and roads, as has been confirmed by the professional light studies which were commissioned by my neighbours. Apart from reduced daylight, the present outlook from these properties will be obliterated by apartment blocks directly opposite and at close range to our homes. Nowhere else in Clifton can be said to afford such an opportunity for prying eyes across narrow roads on such a grand scale. 5. Public 'benefit of access' to the proposed site is insignificant compared with the free public access provided by the nearby spacious Clifton Downs which have no overlooking monotonous houses, but feature trees, space and open skies. Who would choose to visit an artificially created enclave, surrounded by blocks of flat and in the proximity of other visitors, yet with The Downs so nearby? Bristol Zoological Gardens would leave a lasting legacy to this community if the emphasis remained on its splendid gardens. The proposals include the decimation of a majority of its mature trees. This development is alien to the character of this site as part of a Conservation Area as well as being a Historic and Community Asset. If all of these are violated by a brutalist style housing development on such a grand scale, little praise can be offered for the zoo's proclaimed intent for conservation. Detailed and persuasive arguments were submitted by Humphrey's &amp; Co on February 6th, which I recommend and to which I defer. To conclude, the major fear of these proposals is the ghastly height, size, scale, scope and proximity of buildings which, in no way, blend with the local community. If approval is given, they will prove to be an</p>	07-Jul-22
------	---	-----------

	<p>appalling intrusion to the immediate neighbourhood and to the character of Clifton as a Conservation Area.</p>	
--	---	--

130.	<p>There was a time when Bristol Zoological Gardens elicited warm praise and loyal appreciation from Bristol residents, as well as from far afield - roadside directional signs attest to that. Alas - No more. The stunning oasis of calm, so conveniently situated within the community, will be severely diminished as an inspiring social and learning venue, surrounded on all sides by towering structures of massed humanity - hardly a conducive setting for enjoying a day out in "natural" beauty. I'll take the Downs and Ashton Court any day. The relentless lines of vast perimeter flats fail to reflect this Conservation Area. Local homes near the site, as well as a very large school, will be overlooked from all angles by their close proximity. Balcony potted plants and quirky animal murals will not disguise the boxed brutalist style of these monoliths which in no way enhance the area or preserve the character. A Clifton Carbuncle sums it up accurately. Anything which is constructed must correspond in height, scale, shape, form and proportion to existing buildings in the vicinity, and there are a significant number of listed and locally listed buildings on the doorstep, whether residential or within the College. The proposed designs fail to reflect these imposing architectural styles, even worse with such an abrupt clash at close range.</p> <p>The Roads: These will suffer from traffic overload and pressure for parking, especially with the elimination of road space due to the proposed access points for vehicles and pedestrians. Considering the City of Bristol's commitment to traffic reduction and elimination, this is a recipe for further pollution and mayhem, exacerbated by the daily school run. Pupils of all ages traversing the roads to lessons will face increased jeopardy for safety. Northcote Road: Consider the narrow one-way thoroughfare with a single pavement, where residents will be overlooked by 4 and 5 storey structures. A similar fate awaits the school for its many teaching buildings, playground, library and boarding houses. Tall buildings, lining one side, will smother the outlook as has been cited in light surveys. Elsewhere in Clifton, where buildings of such height exist, they aren't directly opposite or nearly so close to each other, or so near the pavement. Light Surveys: I defer to my neighbours who have found, through professionals, that BRE guidelines will have been breached, although it's blatantly obvious that the reductions will be considerable, especially for those at lower elevations. Winter light, especially, will simply be eclipsed to an intolerable degree. Those with lofty views, although receiving more daylight, will still be confronted with a walled expanse from most angles. The plan itself: There is no clear indication in the published plans of how the proposals will actually LOOK from key views. An artist's impression is not good enough with such a watered down, softened appearance intended to look more appealing. Landscape in the Zoo site: I refer to the detailed BTF analysis for a number of shocking statistics, regardless of the replanting scheme. Depressing is the projected net loss in biodiversity of 22%, in contrast to the Zoo's projection of a net gain of 38% Even more depressing is the planned loss of a third of the mature trees. The present Zoo, uniquely, is a masterpiece of GARDENS, as is proudly proclaimed in its name. Plans for the development of communal public parkland cannot possibly keep or maintain such a paradise that has been created over the decades. This alone will be a huge loss, even at ground elevation. Infrastructure in the Community: 200 dwellings would suggest a population surge of twice that number. Can the public services manage that, bearing in mind the need for medical appointments and other services? The total number of dwellings in this area has grown gradually, but a surge would be detrimental in this environ. Pollution: Much has been said about the environmental benefits of this project, but the pollution generated in the area during construction will be undeniable and permeating. This will not be a case of "Wait till the dust settles." The cement pollution alone, during construction, has</p>	07-Jul-22
------	---	-----------

	<p>been proven to affect those, especially with respiratory conditions -- and seriously so, lasting for life. In a similar vein, the mental health of pupils and residents will surely take a knock, just as it is during these deliberations. And finally: It is obvious that I strongly object to the proposals on many counts. Most immediately is the sheer size and scope of the plans regarding structure, height, style and the volume of housing. As has been stated by others, the original founders of the Zoo would be saddened and shocked to know that a housing estate is on the cards. The plans are completely out of character with the surrounding Conservation Area and come not even close to enhancing or improving it. Housing is not the appropriate answer for the Zoo's legacy. But - if it must be so, a far smaller scale should be the ultimate aim.</p>	
--	--	--



131.	<p>I am a Bristol resident living close to the zoo (zoo member too). I am most concerned about this proposed development and strongly object to the plans presented. There seem to be a number of issues that have not been considered properly. This development neighbours a school (i am a parent of school children in this vicinity), and in fact children circulate the area from a number of nearby schools as well, both in the morning and afternoon. The amount of traffic, parking and access considerations seem to have been overlooked in the context of safety for nearby residents and also school children and parents dropping children off to school. There are many children in this area, particularly along Guthrie road, the Avenue, College Road and Northcote road where all the school building are. This feels like an extremely dangerous development as regards the safeguarding and safety of children. By necessity, children have to travel between buildings or for pick-ups and drop-offs, and for the older children, they will be unaccompanied by adults so are at huge risk of a road accident or other more horrific risks, particularly in the winter when it is dark. The school is co-ed so there will also be potentially vulnerable pupils walking on the pavements and crossing roads in large numbers, as well as individuals late at night. There are many evening functions and boarding houses in the area leaving students particularly at risk. I would strongly object to the plans on that basis alone. In addition to that however, and again with the safeguarding of children playing in school playgrounds, or walking between classrooms, these unsightly and far-too tall buildings being proposed present a real risk for those children. These children will be overlooked and could easily be targeted or abused. There is already an issue with poor lighting in the area from a safety perspective, but the large buildings will further block sunlight and create more danger. Apart from the final design failing to take these issues into consideration, the proposed designs also fail to take into consideration the character and historic importance of the architecture in the area. Bristol Planning &amp; conservation go to great lengths to uphold the historic characteristics of Bristols building heritage &amp; local areas. The proposed development is grossly non compliant with this approach &amp; in my opinion is being driven to maximise financial return for the charity / beneficiaries, rather than the community &amp; Bristol heritage. This proposed development will be in a conservation area too. Given the lack of consideration in the aspect and overall plans, I would also be very concerned that the actual construction process itself has been equally poorly considered. The building works will take some years, which will mean construction taking place throughout the schooling year and in particular through the periods of public exams. Having come from a few years of Covid where children have been massively disadvantaged, the building work disruption would again be detrimental to the children's wellbeing and education. Given these will be the particularly difficult years when results are re-normalised, this will be bring even greater stress and further disadvantage to the futures of hundreds of students in the schools in the area. The lives / wellbeing of Bristol future generations once again seems to have been neglected by the developers. So on the basis of these concerns outlined, I would like to record a strong objection to the plans as presented. Best Regards Kirsty Jephcott</p>	07-Jul-22
------	--	-----------

132.	<p>We object on the following grounds. 1. Whilst the stepping of the Clifton Down Block is to be welcomed, the 6 level height at the Northcote road end is too great. It may fit a giraffe graphic but as the Clifton Down elevation shows, it is too dominating. Reducing that level to 5 and stepping down accordingly would be a great improvement. 2. We remain unconvinced by the parking provision. The planning documents suggest that as residents would know when they purchased that there would be no allocated parking, there will be no problem. We think this is unrealistic and residents will struggle to find on street parking in competition with residents from the West Car Park development. 3. We feel that the planning for both the Gardens and the West Car Park should be considered together to ensure design harmony and a coordinated approach to issues such as parking. Tony and Jenny Dugdale</p>	07-Jul-22
133.	<p>I work at Clifton College Prep School and have a number of concerns with the proposed re-development of the zoo. The proposed buildings will overlook our school and playground and will pose a safeguarding risk. In addition, the entry and egress of cars to the proposed buildings will have a direct impact on the safety of our pupils as they are dropped off and collected from Northcote Road and Guthrie Road. This would be particularly dangerous during the construction periods of the buildings. Clifton currently has a good mix of old and new buildings, but those proposed do not match with the environs of the College and the Downs. I am not against modern architecture but these do seem excessive in height and design and as such, I object wholeheartedly to the proposed plans.</p>	07-Jul-22
134.	<p>Dear Sir/ Madam, I wish to object to the above planning application but do not want to provide my home address. My objection is as follows: The proposed plans are not in keeping with the local amenities and would negatively impact neighbouring school children . The proposal presents a safeguarding and safety risk to children at Clifton College for three reasons: first, the height and proximity of the proposed apartment blocks means that children will be in view of residents as they are learning in the teaching building, 8 Northcote road; second, the proposed accommodation is a threat to safety due to increased road traffic; and third, the sense of wellbeing suggested by the central park and lake is diminished by the overbearing, invasive outer development. It is important to note that some children may have court protection orders due to challenging family contexts. Counselling and teaching directly opposite the development would be negatively impacted upon both during construction and thereafter. The proposed outer development needs to be reduced in height, so as to avoid intrusion to education and safety of children. -- Regards, Dr Caroline McGrath</p>	08-Jul-22

135.	I fully support Bristol Zoological Societies plans. As an Environmental Organisation they are consolidating their work of conservation and education and using their resources wisely. They are responding to the challenges of climate change and loss of biodiversity. They are considering the care of their animals, the plot of land they are vacating, and the people living in Clifton. It is a challenging balance to make. I think they are proposing a good compromise which I hope will offer an example of good eco housing, mixed with public access to a well loved historic site. I wish them well.	08-Jul-22
136.	I am very concerned about the proposals to develop the main Zoo site. My concerns are linked to the additional proposal to develop the former Zoo car park in 62 dwellings (as quashed by the High Court on 14th June 2022). In light of the density of the housing proposed and the knock on effect on roads, road safety and social infrastructure, I believe the schemes cannot be looked at separately. Road impact: 201 houses are proposed on the site, with an extra 62 proposed over the road at the Zoo's second proposed housing . The latest census information from Bristol City Council (2011) showed average car ownership is 1.04 cars per household. Other estimates suggest this has risen to 1.39 in the south west over the last 10 years. The impact on the junction with College Road and the Downs will be detrimental to road safety, air quality and traffic flow. The overflow on parking and the excess of delivery vans to the properties throughout the day has not been properly considered. In addition I am concerned for the road safety of children at Clifton College with all the increased traffic. I also object to the fifth oldest zoo in the world dating back to 1835 being turned into a very unimaginative housing development. Surely Bristol City Council is capable of leaving a better legacy to the city? The 'Our World Bristol' plan looked much more exciting and visionary and a far better legacy for Bristol. I appreciate the Zoo site needs to change but I object strongly to the plans as they stand.	08-Jul-22
137.	I should like to express my support for this application. Bristol zoo has presented proposals that fit well with the local area. This is not intensive housing, but instead the plans retain the open aspect of the existing gardens, protect the historic buildings and maintain the public space for the use of the entire community. The zoo has been one of the city's greatest assets during its time in Clifton and the current proposals will help to ensure a smooth transfer of the zoo to a more appropriate location where it can continue to stimulate the local economy as one of the largest visitor attractions in the West Country, while contributing to the conservation of our natural world. There will no doubt be some opposition, it would be impossible to develop a 12 acre urban site without stimulating various responses, but these look to me like a proportionate set of proposals that provide a sensitive approach to the ecology and the context of the site. I wish them well.	09-Jul-22

138.	<p>Dear Sir I would like to object in the strongest possible terms to the plans recently released for the development of The Zoo Gardens of Clifton. Application number: 22/02737/F I have lived and worked in Clifton for much of the last fifty years and have always enjoyed both the relative tranquillity and the architectural magnificence around me. As such, I can only view the proposed plans for the Zoo Gardens with both horror and dismay. I am sure that many have already articulated the concerns about the impact that that many people and that many cars moving into such a small area will have, but for me just as important is the damage it will do to the aesthetics and character of the place. Clifton has always been a jewel in the crown of Bristol and admired far and wide, both within the UK and, as I have found on my travels, further afield as well. It is the part of the city that people who have visited here generally remember well and wax lyrical about in their recollections of the city as a whole - and that surely makes it a key aspect of our legacy. A legacy which you as custodians should be protecting, rather than compromising. I have seen the once beautiful towns surrounding the metropolis of London, places like Dorking and Leatherhead, reduced to customised and characterless imitations of each other, and fear that that is what could well be in store for Clifton. There are areas of outstanding natural beauty which are now protected for the future by law. Surely Clifton as a whole, and the Gardens in particular warrant the same. Generations of citizens have enjoyed this oasis of green and calm and, especially at this time of crisis and concern, about global warming, about such things as the pandemic, surely we owe the future generations the opportunity to enjoy it in the same way. Filling it with huge numbers of new residents and ringing it with buildings that will dwarf the surroundings is not the way forward. It is instead a cul de sac that will ruin a place that so many treasure and love - and accelerate the remorseless march of concrete and metal across our landscapes. We can do better than that - and definitely should. The Gardens are very special, both to Clifton and to Bristol, and create a diversity and a pleasure that your plans would go a long way to eliminating. It is time to think again and to choose a different path. Yours sincerely Nigel Siddall</p>	11-Jul-22
------	--	-----------

139.	<p>Whilst commending the preservation of listed buildings, I find the unimaginative proposals for the rest of the site overbearing, without consideration for the conservation area and failing to consider fully the negative impact on neighbouring residents, their lives and the environment. Specifically, I object to the:</p> <ol style="list-style-type: none"> <li>1. overdevelopment of the site: there are too many dwellings crammed around the perimeter, giving the appearance of post war communist blocks.</li> <li>2. the height of the proposed apartment blocks: residents in Northcote Road, as well as the school, will lose their privacy and suffer considerable loss of light because of the proximity and height of the buildings opposite which is unacceptable. The apartment blocks, particularly the one opposite the Downs will dominate the area, permanently changing the skyline of mature trees and elegant buildings to an ugly grey mass.</li> <li>3. lack of sensitivity to the conservation area: the proposed new buildings are by both size and design oppressive and without interest. They are neither sympathetic to the many historic buildings in the vicinity nor do they compliment them by innovative design. The visual impact will cause irreversible harm to the conservation area.</li> <li>4. insufficient consideration for nature and the environment: the loss of trees and potential damage to others during the building process is unacceptable, effecting nature and bird life in particular. Also there is little thought about the negative impact of the construction process and long term traffic and parking to the gardens.</li> <li>5. inadequate parking provision and regard for traffic flow. The lack of parking is likely to lead to residents parking on, and damaging the garden verges of the circular road. Residents cars, delivery and service vehicles will cause congestion, particularly in Guthrie and Northcote Road which are both narrow giving rise to safety concerns for residents and especially the children of Clifton College.</li> </ol>	11-Jul-22
------	--	-----------

140.	<p>The issues caused by traffic from the 196 proposed units will severely impact the area around the site. It is naïve to expect that residents will not have cars and those numbers are likely to be higher than the numbers suggested by Bristol City Council's calculations. The area already has traffic issues at school drop off and pick up times. It is also an area that is frequented by school children throughout the day. The amount of traffic that this development will produce will lead to it being unsafe for school children (4-18 yrs olds) to circulate during the day. The views of Northcote Road as submitted on 13 January are very deceptive. They present Northcote Road, with the proposed development, as light and airy. The road is not like that now even on a bright, sunny day. The views also omit to show the southern end of Northcote Road with the extreme height and massing of building E3. The views presented by the developer are misleading and misrepresentative and do not clearly show the effects of the height and scale of the proposed development. Building E3's height and location has not changed. It remains domineering and overbearing. Its scale and height dwarfs the other buildings in Northcote Road (see doc. BZG-PPA-ZZ-ZZ-DR-A-2602-PL1) including no 1 and no 2 Northcote road, both tall, substantial Victorian houses. Building E3 is significantly taller (8m measured to the eaves) than these and will block more light from Northcote Road due to E3's extreme height. The overall massing and scale of the proposed buildings on Northcote Road need to be reduced to ensure more light reaches Northcote Road and for reasons of safeguarding as they look directly onto the school and a number of its boarding houses. I strongly object to the proposed development it is all too high and out of keeping for the conservation area and historical buildings are lost.</p>	11-Jul-22
141.	<p>We OBJECT to the above planning application for the following reasons - Out of keeping with the conservation area - Over developed and way too high buildings - Overlooks the boarding houses and playgrounds of Clifton College so is a safety hazard and completely unacceptable. - Congestion of an extra 200 residents in the roads already very congested, there are not enough parking spaces provided within the development and the surrounding roads are already congested enough. - Extra traffic is a safety issues to both Clifton College and Clifton High School - Demand on services, hospitals and doctors in the area are already oversubscribed - Schools in the area are already oversubscribed - The strutures proposed are too tall and cover the whole perimeter of the existing zoo, a block of grey is incredibly ugly and out of keeping for this area of outstanding beauty with Durdham Downs. - 4-6 storey buildings proposed, a 6 storey building on the northern boundary by the Downs is completely unacceptable for local historic buildings and architecture and completely out of keeping. - The plans drawn up are deceptive and shown green space in the middle, however the whole perimeter is surrounded with a mass of 4-6 storey buildings looking into Clifton College and surrounding houses gardens, bedrooms etc</p>	11-Jul-22

142.	<p>The proposed redevelopment of Bristol Zoo Gardens is completely out of keeping for the conservation area of Clifton. The modern blocks of flats above the perimeter walls tower above the street and gardens. These monolithic blocks are entirely incongruent with our area in design, scale, mass and form. They will overwhelm the gardens and obliterate street views of the sky, mature trees and the glimpses of historic buildings that characterise Clifton. A construction project on this scale in a conservation area will completely detract from the desirability and preservation and enhancement of the character of the area. The scale and design may be suitable in a city centre, but is surely inappropriate for our conversation area and looks like something more suitable for Disneyland with hideous balconies with stencils of animals and a humongous 6 storey high green brick giraffe on the side of a building. We were led to believe that the sale of the Zoo Gardens was to pay for new enclosures at Wild Place, but this does not seem to be the case as only the Gorillas and one species of lemur are being relocated! The rest have been shipped off to other zoos, this was not the impression we were given when the Zoo needed to maximise the value of this site. The Zoo is retaining some communal garden space, but it is expected that over 150 mature trees will be removed for this hideous proposed development along with the historic ornamental garden. The towering blocks of flats around the perimeter will not make the communal garden space desirable. The proposed housing development on the north side along Clifton Down and the east side Northcote Road show a building of almost 300 metres of monolithic, uninterrupted block of flats up to 6 storeys high, towering over the existing high perimeter wall and dominating the neighbouring historic buildings. On the north side along Clifton Down from the historic zoo entrance is 150 metres of monolithic, uninterrupted blocks of flats rising to 6 storeys high, some 60ft taller than existing high perimeter walls. Along Guthrie Road near Clifton College's historical buildings the scale is once again overwhelming and completely out of keeping for an area like Clifton in a conservation area. It has to be opposed until a more moderate low level development (3 storeys high max) is proposed that is in keeping with the conservation area and not in some cheap brick with giraffes on the side which is completely out of character with the bath stone and other quarried stone already seen so much in the surrounding roads.</p>	11-Jul-22
143.	<p>I have placed several objections to these plans over the previous months. To my mind mismanagement of the Zoo's aims top my list, followed by inappropriate financial greed, inappropriate architectural dreams, and inappropriate hectoring of those involved with the outcome of traffic planning, amongst others. To those who have taken issue with Clifton College for fighting the planning application I ask; isn't taking care of No. 1 exactly what the Zoo are doing? Bristol Zoo Gardens are approximately 30 years older than the original Clifton College buildings. If Clifton College Chapel, and perhaps other buildings on the campus, is designated as a Grade 2 building by English Heritage could it not be feasible for Bristol Zoo Gardens to become part of English Heritage, Landmark Trust or National Trust to preserve what has been known for generations?</p>	12-Jul-22

144.	<p>I object most strongly to these proposals. Could I be thinking, possibly, that greed, misappropriation, misjudgement are involved? The artists' impressions of how the Bristol Zoo Gardens will look when completed are just an idealised utopia. Don't be seduced- in practice, the realities will be very different. Will the Conservation Hub actually include details of the surrounding conservation area outside the Zoo gardens? I think not. In theory there will be two kinds of people who will live in what is proposed- this who are able to afford what is on offer, and those who are unable to do so. There will be resentment between those who can and those who cannot. I have been unable to come to terms with the 40% of 'Affordable Housing' in this setting, therefore, for those who, like me, are not sure what this means, I recommend two pieces of reading. One is the entry posted on the 15th. July named 'Housing Enabling' and the other on the internet by The Bureau of Investigative Journalism on 'Affordable Housing'. There are approximately 20,000 names on the Bristol City Council's and surrounding areas waiting for 'Social Housing'. In the 1980s Margaret Thatcher's Government introduced the 'Right to Buy' for those in long term tenancy agreements, and some 2,000,000 Council owned properties became privately owned at a heavily subsidised Government rate. Less than 5% have been replaced by new builds. So why has Boris Johnson stated publicly that he intends to extend the scheme? Council/Social housing has always been, and will continue to be, a badly needed source of housing, especially as the population increases at an exponential rate. But, please, not in the Zoo's new build, even though inclusion of 'Affordable Housing' is compulsory. Therefore the whole scheme should be stopped in its tracks with immediate effect. No trees should be felled or damaged in whatever happens in the Zoo Gardens. The gardens themselves that will be open to the public will be a magnet for those aimless individuals who sit around drinking alcohol and leave their discarded containers for others to dispose of. The plans include a grand plan to save the Bear Pit and the Raptor Aviary. These are wild creatures that need to roam. I do hope that the Polar Bear Corner will not be saved. To see the Polar Bears in their confined quarters rocking their heads from side to side as a result of their madness was pitiful. They were shot, as I recall. I would like to see local billionaires offering a substantial collective amount to the present Zoological Society so that The Wild Place Project can go ahead but to leave the present Zoo Gardens and Car park without the shameful blocks of flats and new builds. Surely, in this day and age, an agreement along these lines could be mobilised? The present planning application is a disgrace and needs a radical rethink. It is not fit for purpose.</p>	12-Jul-22
------	--	-----------



145.	<p>Should one drive from Cribbs Causeway, past Westbury on Trym and up Falcondale Road onto Westbury Road, there appears before one's eyes beautifully constructed buildings in what is a familiar red stone. At White Tree roundabout the Downs open up to the right whilst on the left are the buildings that used to be St. Christopher's School. That view continues until Spire Hospital at the top of Blackboy Hill. The houses there are just the frontispiece for Henleaze, Redland and Cotham, mostly in the locally quarried red stone. Turning right at the top of Blackboy Hill takes one onto Downs Road, and the commencement of more beautiful red stoned houses down Pembroke Road, (the only exception being called euphemistically 'Paddy's Wigwam'), and then The Avenue with Clifton College Prep School in red stone. And the The Zoo. Approaching Bristol from the Long Ashton Bypass one has the splendid view of the Crescents overlooking the river and harbour. Along the Portway there are no houses as such until one turns right up Bridge Valley road. At the top, on the right, is Canynge Road which leads into Clifton, but on the right there is a building called The Mansion House, and a substantial row of houses that, again leads to Clifton. What a splendid sight those red houses are. And then the Zoo. I have been familiar with what I have described for seventy odd years. I am dismayed to find the plans for the 'refurbishment' of Bristol Zoo gardens are not in keeping with what I have described, but more of mass habitation out of kilter with the conservation area surrounding it. The tall blocks on the perimeter of the zoo, with animals depicted, will be an eyesore, and once winter arrives with lights on in the windows and the heat pumps operating, they will appear more like a cruise ship at sea. So, with that in mind, I suggest that the planners insist on funnels being included in the plans and the whole being called, 'SS Clifton Encore'.</p>	12-Jul-22
146.		12-Jul-22
147.	<p>I objected before the revised plans. I object again as the changes from the original plans are minimal. The proposed buildings are still too high, too imposing. They will completely change the character of the area, which is a conservation area by the way. The original issues still remain. With these plans, there will be added traffic, more parking problems, added air pollution in the area.</p>	12-Jul-22

148.	<p>I accept that the Zoo animals will have more space at the Wild Place project. However, it is a big shame that we cannot be more imaginative about the use of the site and have to turn it into a strange housing estate. In effect, the plan is to have a few premium houses within the actual grounds of the zoo surrounded by very tall blocks of flats. These blocks of flats will seem very incongruous in the neighbourhood and will be towering over current neighbouring buildings, blocking their natural light and views and creating more traffic and parking concerns. Indeed, the plan provide some parking, but don't take into consideration the extra visitors to the new lodgers, which will add to the parking problems. The idea of keeping the gardens open to the general public is a good gesture, but in effect, the general public won't be travelling to the area just to walk through these gardens and in time, these will only be to the benefit of the people living there. Also these new flats will probably be overlooking the adjacent school's playgrounds and classrooms, which could be a safeguarding issue for the school. My main concern is the height of these buildings and their design which will make them stand out in the area and not be in keeping.</p>	12-Jul-22
149.	<p>I am concerned about the general increase in road use around the area. In spite of a proposed pedestrian crossing, the extra traffic that will result from the new housing, and also the construction traffic in what would be a lengthy development, will be a danger. The high numbers of pupils, at Clifton High School and in particular Clifton College in the immediate vicinity pose a significant risk of road traffic accidents. There have been near misses in the past and by increasing traffic flow, this simply raises the chance of a fatality or life changing injury. Whilst there is allocated parking on the designs, there will inevitably be extra cars parked on the street, which will add to congestion and danger during drop-offs and pick-ups. The height of the buildings will also reduce the light along Northcote Road and Guthrie Road, as well as meaning that the apartments will be overlooking a school playground and classrooms, as well as blocking views and light for residents in these roads too.</p>	12-Jul-22
150.	<p>Dear Sirs I would like to raise the following concerns: Highways safety concerns, in particular concerns in relation to the potential for vehicular conflicts with school drop offs/pick ups and with the movement of children along Guthrie Road, Northcote Road, College Road and The Avenue; ¿ Concerns around the potential for overlooking into the school grounds and buildings; ¿ Impacts on the setting of school buildings which comprise important heritage assets as well as impacts on the character and appearance of the Conservation Area; ¿ Any daylight/sunlight impacts on school buildings; ¿ Concerns around how construction would be managed and any impacts this may have on the operation of the school.</p>	12-Jul-22
151.	<p>Potential safeguarding for high rise flats overlooking school grounds Conflict with school traffic Conflict with main traffic as is already caused by access to the zoo Very important heritage site and buildings will dramatically change the landscape</p>	12-Jul-22

152.	<p>As a zoo member for 17 years I can understand why the zoo wants to redevelop the site and am not against the principle of redeveloping the site. However, I am also a parent of a child at Clifton College and am therefore very familiar with the vehicular access issues of the roads immediately surrounding the zoo. I have read the access documents, Highways Agency report, and the transport statement. It is true that compared to current traffic levels generated at the site from its existing three car parks (assuming we include the Ladies Mile temporary car park), that traffic generated at the site proposed will probably be lower. However, it is disingenuous to therefore conclude that the proposed vehicular access to the site is acceptable. Currently most vehicle access to the BZG site is from Clifton Down into the existing car park at the front of the zoo and closest to the visitor entrance. As proposed there will be no vehicular access to the site from Clifton Down. The next most busy vehicular access is to the Ladies Mile car park (albeit only on certain days of the year). Again this will not be in use in relation to the site. The only current vehicular access that will also be in use in the new site is College Road - as there is currently an overflow car park here. As proposed, vehicular access to the site will primarily use roads which are not currently used by visitors to the BZG site. This is a change at the micro level despite what the planning application states re the overall levels of traffic in the vicinity to the existing site. It is completely inappropriate for access to the site to either be from Guthrie Road or Northcote Road. Northcote road is a particularly narrow one-way road with a very tight bend, which will deliver cars to The Avenue. Both Northcote Road and The Avenue are surrounded by Clifton College buildings which children have to cross continuously throughout the day. They are already busy enough with existing traffic and it would be unsafe to add any more traffic. Guthrie Road is also already very busy and is not wide enough for two cars to pass for most of its length. Adding any more traffic would make the safety for school children even worse than currently as again there is a need to cross the road continuously to access the spread out school buildings. The existing access for buses for sports transport to the school's sports ground in Failand and trips would also be significantly affected. Overall I think the traffic access needs to be revised and the only acceptable vehicular access to the site should be from Clifton Down. If this is not possible because the zoo does not own the land that would enable this, then the zoo needs to rethink its intentions. This is before we consider overlooking, impact on heritage assets, and how construction will be managed given the access points proposed. All of which are reasons to object in their own right.</p>	12-Jul-22
153.	<p>Dear sir/madam, The idea of the zoo turn into residential will be DISASTER. it will be clogged with car park problem, congestion etc., it would be good to preserve and make the Zoo for more environmentally friendly. It will only profit the company who make the building/housing. It will affect our community, the school - Clifton College. Please do not give permission to build into a commercial or property development.</p>	12-Jul-22

154.	This space should remain as an area of natural beauty for general public enjoyment. An alternative plan ought to be implemented without the creation of further dwellings in the relevant area. The addition of peripheral housing will detract greatly from accessibility of the remaining gardens, irreversibly diminish the historic nature of the preexisting buildings, all while increasing the population density of the area and causing significant additional burden on the surrounding infrastructure. Clifton is already densely populated and this planning application will worsen the living conditions of all, including new residents within any complex. Converting an important national public asset (in public, charitable hands) into a housing development is very far from the stated objective of BZS/BZG "protecting the legacy of Bristol Zoo Gardens". The Charity Commission ought to be invited to comment on the conversion of critical charity assets so inseparable from the charitable objectives of BZS/BZG.	12-Jul-22
155.	Whilst I understand the need for the site to be developed the design of the proposed residential buildings are ugly and totally out of keeing with their surrounding properties. Please ensure a more appropriate design is used.	12-Jul-22
156.	Dear Sir, I am writing in support of the above planning application and thoroughly approve of all of the changes made in Savill's cover letter, Planning Statement and supporting documents. Yours faithfully Miriam Hare ( Mrs )	12-Jul-22
157.	I think the planned proposal responds sensitively to its setting. I approve of its sustainability proposals, and as someone whose ancestor, Francis Adams, sold the land to the Zoo in the first place, I like the way that some of the historical buildings including the Aquarium are being conserved. I particularly approve of the public access to the gardens in the daytime and of delivering 200 high quality eco friendly new homes for Bristol.	12-Jul-22

158.	<p>22/02737/F Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings. Principle of redevelopment The Zoo Gardens are designated as public open space in the development plan and on reflection the Society is not convinced by the current plans to partially develop the site for housing whilst retaining open space as publicly accessible gardens. We think that the proposal is neither fish nor fowl. It would be better either being kept as open space or redeveloped for housing. The Society questions who will wish to visit the site when it is surrounded and dominated by private housing. The special character of the existing Gardens will be further eroded with vehicles accessing an area where no vehicles have previously been permitted, both passing through the open space and parking there on a permanent basis. The verdant nature of the area will inevitably be completely transformed. In addition, there will be the challenge of maintaining such a significant area of open space, presumably paid for by service charges on future residents. There will be inevitable pressure to create a gated community at some point in the future. The Zoo Gardens currently provide an oasis of calm that has been enjoyed by Bristolians for generations. We consider that they are of such special environmental and historical importance that they should be retained as a fully accessible public asset. Detailed response Nevertheless, if the development in something like its current housing plus open space form is accepted, we have the following comments. In our response to the earlier consultation we welcomed the principles published to guide the future of the Bristol Zoo site. The Society has considered whether the proposals match the aspiration of these principles. In particular, the aim to "create an inspiring and sustainable development that celebrates the site's natural and built heritage. We will create space for communities to thrive and the wider public to enjoy - a legacy to make us and Bristol proud." The retention of open space for future public access (even if used less than if it was completely open space), and the reuse of historic buildings, are positive proposals. The proposed Conservation Hub is welcome. However, in the Society's view the current proposals fall short of the stated aspirations in a number of ways. Aspects of the proposals also cut across adopted development plan policies, in particular DM17 in the Bristol Local Plan - Site Allocations and Development Management Policies which states, "Development on part, or all, of an Important Open Space as designated on the Policies Map will not be permitted unless the development is ancillary to the open space use." The Society has reservations over the heights of several of the proposed residential blocks and considers that further detailed assessment will be required. The Society also has reservations about the quality of the architecture, and notes that others have also expressed the view that this site deserves building design proposals which make a much more positive contribution to the appearance of the Conservation Area and to the setting of Listed Buildings. This particular issue remains a critical aspect when making an overall assessment of the case to change the main use of the site. The Society is disappointed by the lack of ambition with respect to the eco credentials of the project, particularly with such a high level of car provision in such an accessible location. Height of buildings The Society has significant reservations about the heights of several of the proposed residential blocks and considers that further detailed assessment will be required. These reservations concern the impact of the heights of the perimeter blocks on the wider conservation area and on the internal character of the gardens themselves. The latter concern also applies to the town</p>	12-Jul-22
------	--	-----------

	<p>houses arcing around the lake, albeit to a lesser extent. Further assessment is required with respect to the proposed residential blocks to the north and northeast. At 7 storeys the corner block may well have adverse impacts both on the general appearance of the Conservation Area and on the specific amenities of neighbouring properties. Whilst the heights on the northern edge reduce gradually from 6, 5 and 4 storeys there is a need to carefully assess their visual impact. The Society is not convinced that the planning application demonstrates the potential impact of the proposed buildings by means of verified views. It has proved difficult to identify which views are being demonstrated and to assess in detail the potential future impact, particularly on neighbouring residents. Clifton Conservation Hub The Society welcomes the proposal to repurpose the iconic entrance building to provide for a range of conservation related activities. This seems an appropriate future for this historic part of the site. Vehicle access, circulation, and parking The Society is disappointed by the lack of ambition with respect to future car ownership and parking. Surely this well-located site has the potential to become an exemplar for a car-free development. The developers' own plan showing "resident routes to key local facilities" provides very real evidence that key local facilities are all within easy walking distance. The need to provide circulation routes and undercroft parking areas makes the development much more invasive in terms of its impacts on the gardens than would be necessary with a car-free scheme. Details are required to demonstrate how the proposed vehicle access off Northcote Road will actually operate in practice. The Guthrie Road access exists and is more straightforward in terms of future operation. Retention of public access As noted above, there is clearly a challenge in retaining public access to the open spaces when they will be bounded by private residential areas. The juxtaposition of private and public outside areas will need very careful design and planning to ensure satisfying experiences for all parties. There is lack of clarity about the future of the water body - is it really to be utilised for wind surfing and boating or for more conservation related purposes? As the illustrations demonstrate, and notwithstanding the efforts made to avoid significant incursions into the gardens, the Society fears that much of the essential character of the gardens will be lost. This is because of the likely visual dominance of the apartment blocks and the resulting sense of overbearing the gardens. Currently the gardens offer oases of tranquillity and privacy from urban bustle, with a minimal sense of intrusion from the outside world. There is a very real risk these will be lost, in part because of the dominance of the proposed buildings but also because of the manner in which the service roads dissect the site and will bring vehicular movement deep into the gardens. It is absolutely fundamental that if the BZS truly want to deliver a legacy consistent with the principles it published, then it should commit to binding any future developer to the proposals.</p>	
159.	I fully support preservation and propose enhancing the existing historical Zoo; and wholeheartedly oppose the redevelopment plans.	12-Jul-22
160.	This is a terrible and unimaginative use of the space and I strongly object. We do not need more houses and instead need a peaceful space that the existing community can enjoy. More housing will only add to increased population and traffic in an already heavily populated area.	12-Jul-22
161.		13-Jul-22

162.	I am a parent of a child who boards at Clifton College in a house directly opposite this house. I do not want under any circumstances people living in these 201 houses looking into my sons dormitory or indeed whilst he is in lessons. Any person, potential sex offender, secret paedophile can buy or rent one of these properties. It is disgusting of the Zoo to propose this. The site should be kept as an environmental learning centre for ALL children in BCC area. The Zoo cares for animals - why not children?. Surely there is a safeguarding issue here?	13-Jul-22
163.	I fully support this proposal, which will add much needed smaller housing units to Clifton. It's particularly welcome that there will be free access to the gardens for all (not the case now). I have complete confidence that the Zoo will have carefully considered all viable options and that the proposed scheme, when finished, will be of benefit to the neighbourhood and local residents.	13-Jul-22
164.	The updated plans remain wholly inappropriate in an area of conservation. The proximity to the school, the Downs and a Resedential neighbourhood has not been considered in proposing a huge block of flats that are an eyesore. I'm not opposed to development but I can see no sensitivity demonstrated here. Strongly oppose	13-Jul-22
165.	I have not seen any part of the revised plan which considers the impact on the neighbourhood, surrounding schools, traffic and conservation area.	13-Jul-22
166.	I fully object to the proposed plans as they stand for the following reasons: Major concern over the height of the new buildings. They will limit light to the surrounding homes, school and frankly make no sense in a conservation area. Furthermore, the school grounds and buildings will be overlooked. Whilst I appreciate the need for homes - this is a completely inappropriate site. Due to size of the plot 200 homes requires a 'high rise' modern type build, will increase traffic (in an already busy area), reduce air quality, create major safety issues for the neighbourhood and 2 large schools and destroy the feel of the conservation area. Why does it have to be 200 homes - I fail to see the rationale for this number in this particular area. The overall management of the build in an area with constant flow of school traffic and children is a major concern. The area already suffers from unsafe drivers. I can't see a construction management plan. Whilst it would be wonderful to see this historic site continue to benefit Bristol - this current plan appears to benefit the pockets of the developers at the detriment of those who actually reside in Bristol.	13-Jul-22
167.	I object most strongly. The plan to build so many blocks so close to the boundary and with buildings so high is preposterous as it will upset the local residents of College Road and Northcote Road as well the students and staff of Clifton College whose privacy will be invaded. The noise disruption should also be considered and the air pollution that would ensue with so many extra vehicles would be undesirable. The interior area of the site looks delightful so would it be possible to develop this idea further by constructing more houses there?	13-Jul-22

168.	When I first saw the proposal I uttered the words of John McEnroe: "You can't be serious!". Even a child would spot the failings of this proposal. Too high, too many and far too ugly. This is a wonderful opportunity to develop probably the best building site in the UK and what is being proposed is shameful. The City of Bristol deserves better than to allow greed to offset conservation of the aesthetic of its architecture. I note that many of those in support don't live anywhere near the site and this should be borne in mind when the planning decision is made.	13-Jul-22
169.	I support this application. Although I am sad to see the Zoo go from its existing site, I think the the proposed use of the land is very much in keeping with the area and will provide amenities for the community for years to come. I note that not only are there plans for public use of the gardens, but also mixed tenure housing to bring balanced communities to one of the most affluent parts of Bristol, building on its legacy as a city where opportunities created by the great city are shared.	13-Jul-22
170.	The parking is already difficult here in Clifton, and the shops and cafes have sufficient trade. Princess Victoria Street - narrowed as it now is - has now become over-cluttered. An increase in numbers of cars, bikes and e-scooters would not improve the area.	13-Jul-22
171.	The proposed development is completely inappropriate in this location between the Downs and Clifton College School. It will be very detrimental to the heritage aspects linked to multiple buildings in the immediate vicinity which is a Conservation Area. It is hard to see how the safety risk and nuisance from the number of additional and heavy traffic movements both during construction and once complete can be adequately mitigated - if you consider the construction of Crossrail as an example; although the main construction works had a very good safety record, 4 members of the public were killed, in separate accidents by construction lorries associated with the project - this is a risk that cannot be ignored particularly bearing in mind the proximity of a major school.	13-Jul-22
172.		14-Jul-22
173.	The size of the proposed development is totally out of keeping with the local area and impacts negatively on the Clifton conservation area. The proposed felling of over 40% of trees on site does not conform to conservation guidelines. The site will unsafely mix a huge increase in traffic on the site with pedestrians and there is no guarantee that the site will remain open to public pedestrian access in the long term. This reduces an open space amenity and increases pollution and built up areas. Whilst the site proposes to have affordable housing, it is unlikely to be in high enough numbers to meet housing needs, instead providing high net worth individuals with luxury premises at the expenses of demolishing or converting historic buildings of community and cultural value. Change the use of the site by all means but do not grant permission to developers motivated by profit with no thought to a valuable community resource and open space.	14-Jul-22



174.	<p>I am concerned about the scale and number of the additional residential buildings that seem totally out of keeping for a conservation area. This large construction project that will bring significant heavy goods vehicles and plant machinery during construction will have a detrimental effect on local traffic, increase pollution and could compromise schoolchildren's safety in Guthrie Rd and College Rd. If and when completed, this scheme will bring with it too many additional residents' vehicles for the inadequate parking proposed for the development. A spurious assumption that residents probably won't have vehicles would not I'm sure hold water. These additional vehicles will invariably park in the local residential roads that are already choked with cars especially during University term times when we are inundated with student vehicles that rarely move. The proposal that will bring yet more vehicles to Clifton without providing any additional parking is surely counter to BCC's environmental and transport policies and certainly impacts on residents such as ourselves who do not have off road parking. It appears obvious that high density, high price housing planned to enrich the developers is driving a proposal that will add little to the local community, will increase road traffic and pollution whilst removing an historic and aesthetically appropriate visitor attraction. I totally understand the Zoo's need and wish to move and understand that something must use the valuable space they vacate. The alternative proposal floated for a future environmental visitor attraction seems to have many merits. But I object totally to the proposal for high density scheme that does not consider the impact on the local community as currently configured.</p>	14-Jul-22
------	---	-----------

175.	<p>I write as a former pupil of Clifton College who is still connected to it and also as a part-time local resident. I wish to object to the proposals. The Zoo has enjoyed and earned a fine reputation locally, nationally and internationally since the 1830s. It has had a very good relationship with the College and other neighbours for at least 160 years. If these proposals go through, its legacy will be seen very differently. Specifically, the addition of 200 dwellings on this site will greatly increase the flow of traffic, particularly larger and service vehicles, through College Road, Guthrie Road and Northcote Road. All of these are used throughout the school term by pupils - some of them very young - as they travel within the wider College campus. Northcote Road is particularly vulnerable, being a narrow one-way, residential street often already filled with parking and is used by large numbers of young pupils. The anticipated significant increase in the volume and nature of traffic has to create a real risk for the pupils of the College (and those who supervise them) and other neighbours. The proposal includes buildings of 5, 6 and 7 storeys and these will overlook many neighbours. There have to be specific safeguarding risks in the current proposals, particularly relating to the children of the College (and other children living locally) in these circumstances. It is highly pertinent that this will include children boarding in the College on a full-time basis. Many very local neighbours will be significantly impacted by the reduction in sunlight. The surrounding area will be significantly impacted by these proposals in terms of the loss of historic views, whether that is from within Clifton Village or from the Downs. The proposed development is within a Conservation Area and in what has been described as "the finest suburb in England". The planning authorities should be seeking to maintain that reputation. This does not mean not allowing the site to be developed or sanctioning only a pastiche development. What it does mean is that any development should be modern, proportionate and sympathetic to the surrounding area. This proposal is none of those things and the Zoo will leave the site it has enjoyed for almost 2 centuries with a regrettable legacy and its fine reputation diminished and with the planning authority creating a precedent for development it may also regret.</p>	15-Jul-22
------	---	-----------

176.	<p>15 July 2022 Bristol Zoological Gardens Redevelopment 22/02737/F Letter of Objection Dear Mr Bunt Speaking as Bristol resident for most of my adult life, a large part of which was spent in Clifton, I strongly object to the shocking proposals for the development of the Zoo following its impending departure. The Zoo has always been a vital part of the community as well as for the entire City of Bristol as well as an attraction for the whole of the Southwest of England and Wales. For it to be replaced by such a massive housing development of such proportions is too horrible to fathom. Although aerial projections show pleasing parkland and a smattering of reasonable sized houses, the perimeter of the Zoo site is nothing but relentless barricades of high-rise flats which are a horrifying addition to the neighbourhood, whether viewed from within or from the surrounding roads, residences and the school. The whole concept is absolutely abhorrent, especially within the Conservation Area. The architecture alone does not reflect this part of Bristol in the least. I gather that 200 homes are envisioned. The result of such a plan guarantees the arrival of at least 400 new residents and the strain on infrastructure for matters more than increased traffic and parking mayhem. Our experience when living in this area always involved the challenge of street parking, but there was always greater ease when school was not in session. But now - the problems will be more constant with many more permanent residents. My greatest objection, however, regards the monstrous perimeter structures - their height, size, volume, architecture and complete lack of a sympathetic blend with the Clifton Conservation Area. Having not been to previous consultations, it is hard to comprehend that something like this has been allowed to progress to this stage. As stated, I strongly object to the proposals on all counts, but particularly for the scope of this appalling project. Yours sincerely Mary Isaac</p>	15-Jul-22
177.	<p>We would like to object strongly to the proposed plans for the development of the zoo - for the reasons outlined so succinctly by the Tobacco Factory. They would forever change the nature of a very special area.</p>	16-Jul-22
178.	<p>We would like to object again to the proposed development at Bristol Zoo which would undoubtedly make life difficult for Clifton College. The buildings overpower all those nearby and the parking provision appears totally inadequate. Moreover, the strain on local services such as doctors' surgeries would be excessive.</p>	16-Jul-22
179.	<p>We would like to object to the proposed development at Bristol Zoo. The intended buildings at the edge of the site are totally out of keeping with the surrounding late nineteenth century architecture, in building materials, design and scale. This is particularly undesirable in a conservation area. Moreover, it is surely unrealistic to think that private houses within the site will mix with play areas and paths for cyclists travelling at speed. Such density of housing would set a dangerous precedent for future development in Clifton. We would also deplore the felling of any trees at the site. Jon and Pat Millington</p>	16-Jul-22

180.	This is an abomination! The design is totally out of keeping with what is a very beautiful and historic part of the City. The principle of housing on the site of the zoo is not in question, but the design is dreadful and should be completely re-thought.	17-Jul-22
181.		17-Jul-22
182.	<p>I have loved visiting the zoo since I was a little girl, as did my parents and grandparents. There are fond stories from each generation of my family and I look forward to visiting the new site at Wildspace and starting more memories there in due course. While I grew up on the outskirts of the city I now live and work in Clifton, it is my home. I am sincerely disappointed with these plans. I am perhaps biased - I fell in love with the Our world Bristol idea being supported by the Eden Project and backed by local businesses to create the Worlds First Virtual Reality Zoo and Gardens. These plans have my backing as true vision for the future and cementing a Bristol Zoo legacy while increasing the gardens size. My two criticisms: out of character designs for the area and the loss of nearly 45% of the 381 trees. But putting my perhaps bias aside I do have concerns for these plans the architecture doesn't fit in with surrounding buildings. The neighbouring houses are dominantly Georgian and Victorian structures, while the building designs here are modern and the character in my opinion would be lost. If you are building in such a historic area there needs to be more sympathetic to the neighbouring designs. The gardens have been lovingly planted and looked after for 180 + years, they have been planted like the Westonbirt Abroteum - they are meant to be viewed together and were landscaped purposely for the backdrop of the zoo. The loss of nearly 45% of the trees is unacceptable in a modern city like Bristol during an acknowledged Climate crisis. There is 381 trees in the Bristol Zoo gardens and nearly 45% of the trees would be felled with these deigns and the remaining trees would be put at risk due to their root systems likely being damaged during the construction phase that it is likely the loss would be far greater than 45%. The loss of biodiversity and canopy cover would be felt and noticed for residents. It is estimated there would be a biodiversity net loss of 22% by the Bristol Tree Forum rather than the net gain of 36% they are proposing. I question some of their maths in the application, which doesn't add up and call for an independent calculation. These gardens have been a part of the city since 1836 and they have been lovingly maintained by the zoo - the trees in the zoo gardens are noted nationally (champion trees from the gardens are included on the national register) and internationally recognised too and should not be felled or put at risk. This is not the legacy the zoo should leave behind in its home of over 180 years - it has a responsibility to practice what they preach. Losing this many trees will negatively affect the tree canopy cover in the area. While the Clifton ward has one of the best tree canopy covers in Bristol, it is still under the recommended tree canopy cover for a healthy city of 30%. We need to be prioritising existing mature trees while planting new ones, mature trees have larger canopy cover than newly planted trees. (Replacing a 100 year old tree with new sapling will not cover the loss of habitat, biodiversity or canopy cover and thus carbon intake.) Also there is no tree planting sites remaining in Clifton or Clifton Down - the area would lose this canopy cover and trees altogether. The Zoo charity has a responsibility to Bristol residents and neighbours to provide best value, this is not exclusive to price from property developers but best decision to seal their legacy and to leave behind something worthwhile. I have read both the Clifton and Hotwells Improvement Society response and the Bristol Tree Forum's response and am concerned with the zoos current application. The trees should be awarded TPO's and protected, the plans need to be re-thought out so 90% of the trees are retained.</p>	17-Jul-22

183.	<p>Actually very disappointed with these designs. I understand the zoo wants to make a hefty profit from property developers but as someone who has been their neighbour for a significant number of years I feel they are letting us down. I have read comments made by the Clifton and Hotwells Improvement Society, Bristol Tree Forum, Historic England, CAP and a number of local people within Bristol boundary. Most comments are in favour for the relocation of the zoo, while it is a much beloved part of our city the need for bigger enclosures so the animals have a better quality of life has been much needed for a long time. However, most comments are not in favour of these designs and plans. They lack imagination and do not fit in to the conservation area it is in. The designs are disappointing and will soon become an eye sore within the Georgian and Victorian community it is surrounded by. As many residents already struggle with parking and deliveries things will only get worse. It feels Bristol is a leader for the environment, we were the green capitol in 2015, we led cities in the UK to acknowledge the Climate crisis, Greta Thunberg gave a speech to the masses here just before the lockdowns. Why with a disappearing tree canopy across our city are we entertaining plans that do not respect our beliefs and mature and ancient trees. Nearly 45 % trees look to be felled under these plans, yet the actual number will be much higher - many roots will be destroyed or damaged in construction and their root protection acts won't be upheld. The transplant of several trees idea is a lovely idea but the success rate of trees being moved is low but won't be seen for several years. It is likely out of the hundreds of trees it is likely 70% + trees will be felled or die. It is outrageous the area will lose so much biodiversity, mature and ancient tree canopy cover and the designs to be destroyed and not replaced in the area - as there are no available tree planting pits in the Clifton, Clifton Down wards on the Bristol City Council website. Marvin Rees, councillor for property development should be disappointed for these plans. I reject these proposals. I welcome new plans with a better understanding for the area and more respect for the nature and the gardens they want to be built on.</p>	17-Jul-22
184.	<p>I have placed several objections to these plans over the previous months. To my mind mismanagement of the Zoo's aims top my list, followed by inappropriate financial greed, inappropriate architectural dreams, and inappropriate hectoring of those involved with the outcome of traffic planning, amongst others. To those who have taken issue with Clifton College for fighting the planning application I ask; isn't taking care of No. 1 exactly what the Zoo are doing? Bristol Zoo Gardens are approximately 30 years older than the original Clifton College buildings. If Clifton College Chapel, and perhaps other buildings on the campus, is designated as a Grade 2 building by English Heritage could it not be feasible for Bristol Zoo Gardens to become part of English Heritage, Landmark Trust or National Trust to preserve what has been known for generations?</p>	18-Jul-22

185.	<p>Should one drive from Cribbs Causeway, past Westbury on Trym and up Falcondale Road onto Westbury Road, there appears before one's eyes beautifully constructed buildings in what is a familiar red stone. At White Tree roundabout the Downs open up to the right whilst on the left are the buildings that used to be St. Christopher's School. That view continues until Spire Hospital at the top of Blackboy Hill. The houses there are just the frontispiece for Henleaze, Redland and Cotham, mostly in the locally quarried red stone. Turning right at the top of Blackboy Hill takes one onto Downs Road, and the commencement of more beautiful red stoned houses down Pembroke Road, (the only exception being called euphemistically 'Paddy's Wigwam'), and then The Avenue with Clifton College Prep School in red stone. And the The Zoo. Approaching Bristol from the Long Ashton Bypass one has the splendid view of the Crescents overlooking the river and harbour. Along the Portway there are no houses as such until one turns right up Bridge Valley road. At the top, on the right, is Canynge Road which leads into Clifton, but on the right there is a building called The Mansion House, and a substantial row of houses that, again leads to Clifton. What a splendid sight those red houses are. And then the Zoo. I have been familiar with what I have described for seventy odd years. I am dismayed to find the plans for the 'refurbishment' of Bristol Zoo gardens are not in keeping with what I have described, but more of mass habitation out of kilter with the conservation area surrounding it. The tall blocks on the perimeter of the zoo, with animals depicted, will be an eyesore, and once winter arrives with lights on in the windows and the heat pumps operating, they will appear more like a cruise ship at sea. So, with that in mind, I suggest that the planners insist on funnels being included in the plans and the whole being called, 'SS Clifton Encore'.</p>	18-Jul-22
186.		18-Jul-22

187.	<p>I object most strongly to these proposals. Could I be thinking, possibly, that greed, misappropriation, misjudgement are involved? The artists' impressions of how the Bristol Zoo Gardens will look when completed are just an idealised utopia. Don't be seduced- in practice, the realities will be very different. Will the Conservation Hub actually include details of the surrounding conservation area outside the Zoo gardens? I think not. In theory there will be two kinds of people who will live in what is proposed- this who are able to afford what is on offer, and those who are unable to do so. There will be resentment between those who can and those who cannot. I have been unable to come to terms with the 40% of 'Affordable Housing' in this setting, therefore, for those who, like me, are not sure what this means, I recommend two pieces of reading. One is the entry posted on the 15th. July named 'Housing Enabling' and the other on the internet by The Bureau of Investigative Journalism on 'Affordable Housing'. There are approximately 20,000 names on the Bristol City Council's and surrounding areas waiting for 'Social Housing'. In the 1980s Margaret Thatcher's Government introduced the 'Right to Buy' for those in long term tenancy agreements, and some 2,000,000 Council owned properties became privately owned at a heavily subsidised Government rate. Less than 5% have been replaced by new builds. So why has Boris Johnson stated publicly that he intends to extend the scheme? Council/Social housing has always been, and will continue to be, a badly needed source of housing, especially as the population increases at an exponential rate. But, please, not in the Zoo's new build, even though inclusion of 'Affordable Housing' is compulsory. Therefore the whole scheme should be stopped in its tracks with immediate effect. No trees should be felled or damaged in whatever happens in the Zoo Gardens. The gardens themselves that will be open to the public will be a magnet for those aimless individuals who sit around drinking alcohol and leave their discarded containers for others to dispose of. The plans include a grand plan to save the Bear Pit and the Raptor Aviary. These are wild creatures that need to roam. I do hope that the Polar Bear Corner will not be saved. To see the Polar Bears in their confined quarters rocking their heads from side to side as a result of their madness was pitiful. They were shot, as I recall. I would like to see local billionaires offering a substantial collective amount to the present Zoological Society so that The Wild Place Project can go ahead but to leave the present Zoo Gardens and Car park without the shameful blocks of flats and new builds. Surely, in this day and age, an agreement along these lines could be mobilised? The present planning application is a disgrace and needs a radical rethink. It is not fit for purpose.</p>	18-Jul-22
188.		18-Jul-22

189.	<p>At first sight the plans would appear to have some positives - providing a range of housing, keeping the gardens as a community resource, as well as preserving historic zoo buildings. There are many admirable box ticks - eco friendly credentials in spades, a conservation hub, disabled parking, play areas, exhibition and meeting spaces. Get past the idealised artist's impressions, however, and a different story emerges. The surrounding conservation area, which includes the many listed buildings on the Clifton College campus, is famous for the harmoniousness of its architectural style and proportions. I am reluctant to use the now overworked 'iconic' but the view of the College as you walk up College Road, alongside The Close and towards the Chapel can only be described thus. Imagine passing the Memorial Arch and being confronted with this proposed abomination. The planners seem keen to preserve or repurpose the historic structures in the zoo and some of these existing buildings will no doubt become very desirable homes, though why anyone would want to preserve structures such as the Bear Pit and the Birds of Prey Aviary, where beautiful birds and creatures lived a life of monotony and misery eludes me. Unfortunately the architects seem to have gone out of their way to provide the most incongruous design possible when it comes to the apartment blocks around the perimeter. They can only be described as an eyesore in the context of their surroundings. No amount of animal murals, cascading greenery and elephant bunting will disguise this. I am sure the new designs have architectural merit in many settings but please, not here. Apart from the lack of aesthetic appeal the blocks are far too tall and their close proximity to other buildings will have a negative impact on the daylight and privacy of local residents and the students working and living at Clifton College. The desire to keep large areas of the site as communal gardens is laudable, but the ambitious plans for landscaping and planting will require a large team of gardeners and groundsmen to maintain. Will the residents in affordable housing be willing or even able to contribute to this? The number of spaces allotted for parking - 100 - is totally inadequate for 200 residences in an area which already struggles for space. Twelve acres is a comparatively small area for this project and I believe it is too much of a compromise to provide this density of housing alongside the planned areas of open space. I strongly object to these proposals.</p>	18-Jul-22
------	--	-----------



190.	<p>The Bristol Zoo site has been a marvellous resource for the residents of the whole of Bristol and a wide surrounding area for a very long time. I believe it should be preserved and maintained as a Botanical Garden which it has been up until now. The surrounding prison-like walls should be demolished - they are no longer needed to protect citizens from ferocious wild animals. The area can be opened up for free access on a permanent basis for Bristol residents at least. It is very likely that residents in the surrounding areas would be willing to contribute by subscription to maintain this as a free service for everyone. The model in my mind is that of the very old and spectacular Botanical Gardens in Durban, South Africa. I do not think that present plans will lead to this site being freely open to the public for very long because those who have paid considerable sums for the larger accommodations will inevitably want to exclude the public after some time and I do not know how effective any safeguards would be to prevent this. Affordable housing is a praiseworthy concept which I would support. In fact, it would be better to set aside an area on the periphery of the site for modest but well designed affordable housing only, perhaps available to key workers for rent (otherwise modest purchased houses would be passed on at immodest prices after a while). This might require the financial and administrative input of Bristol City Council and I don't know how they would regard this. The present building plans are, as usual, completely out of character for this part of Bristol. The buildings are too tall and too monolithic. Whatever else is decided, far prettier buildings are needed to fit in with local character. The ground floor parking under the proposed new buildings is inexpressibly ugly and inappropriate in these times. Vehicle parking should only be available to staff maintaining the gardens. There has never been parking on the zoo site and it should not start now. There is a very good adjacent public bus service. Like the Cribbs Causeway development which is not in Bristol, the new Wild Place Project zoo site is outside Bristol and no benefits, financial or reputational, accrue to Bristol. Let us at least make a new and spectacular Botanical Garden a credit to Bristol.</p>	18-Jul-22
------	---	-----------

191.	<p>The Bristol Zoo site has been a marvellous resource for the residents of the whole of Bristol and a wide surrounding area for a very long time. I believe it should be preserved and maintained as a Botanical Garden which it has been up until now. The surrounding prison-like walls should be demolished - they are no longer needed to protect citizens from ferocious wild animals. The area can be opened up for free access on a permanent basis for Bristol residents at least. It is very likely that residents in the surrounding areas would be willing to contribute by subscription to maintain this as a free service for everyone, and I certainly would. The model in my mind is that of the very old and spectacular Botanical Gardens in Durban, South Africa. I do not think that present plans will lead to this site being freely open to the public for very long because those who have paid considerable sums for the larger accommodations will inevitably want to exclude the public after some time and I doubt the efficacy of any safeguards to prevent this. Affordable housing is a praiseworthy concept which I would support. In fact, it would be better to set aside an area on the periphery of the site for modest but well designed affordable housing only, perhaps available to key workers for rent (otherwise modest purchased houses would be passed on at immodest prices after a while). The present building plans are, as usual, completely out of character for the heritage of historic Bristol. The buildings are too tall and too monolithic. Whatever else is decided, far prettier buildings are needed to fit in with local character. The ground floor parking under the proposed new buildings is inexpressibly ugly and inappropriate in these times. Vehicle parking should only be available to staff maintaining the gardens. There has never been parking on the zoo site and it should not start now. There is a very good adjacent public bus service. Like the Cribbs Causeway development which is not in Bristol, the new Wild Place Project zoo site is outside Bristol and no benefits, financial or reputational, accrue to Bristol. Let us at least make a new and spectacular Botanical Garden a credit to Bristol.</p>	18-Jul-22
------	--	-----------

192.	<p>I'm writing to object to the proposal of the redevelopment of the Bristol Zoo grounds as set out in 22/02737/F. As a parent of several children that attend Clifton College I have the following concerns: 1. Highways &amp; child safety concerns, in particular concerns in relation to the potential for vehicular conflicts with school drop offs/pick ups and with the movement of children along Guthrie Road, Northcote Road, College Road and The Avenue. I am concerned around the increased risk to child safety during pick up/ drop off from schools, and during the movement between buildings during the school day. This includes during proposed construction. As a former Chair of Governors of another Bristol school, who's son was hit by a car coming home from school I wrote to the Council requesting revisions to road safety - this was ignored - and regrettably, a few years later a pupil was killed by a vehicle meters from where my son had been hit. 2. Concerns around the potential for overlooking into the school grounds and buildings- as a society we have a duty of care to protect children, and the current proposals do not allow such protection with the overlooking of school grounds enabling increased risk of predatory advances, photographs and targeting of specific children. 3. The development will have a significant impact on the setting of school buildings which comprise important heritage assets as well as impacts on the character and appearance of the Conservation Area. This devalues the heritage of the school and surrounding area. 4. The current proposals will have a negative impact on daylight/sunlight on school buildings which directly effects the learning of pupils, and in particular those that suffer from Seasonal Affective Disorder, and other mental health conditions. 5. I have serious concerns around how construction would be managed and the significant impact this may have on the operation of the school during this period, which is likely to be extensive.</p>	18-Jul-22
------	--	-----------

193.	<p>Objecting to a monstrous overdevelopment in a conservation area adjoining a school. The proposal seeks to triple the elevations of some of the existing buildings to then overlook school playgrounds, walkways and classrooms. Clifton College and buildings were designed by a legendary architect in Charles Hansom. The Zoo was also constructed in a sympathetic style to reflect the Clifton community and heritage. This proposal is not in keeping with any proportionality or sympathy for the existing neighbourhood and would ruin the nature of the area. In addition to the concerns for local school children, this proposal seeks to create the most densely populated area within Clifton which is renowned for being a historical setting without being encumbered by high rise blocks for which there is not sufficient road space to support. It is deeply inappropriate to position high rise housing with balconies overlooking school children and these plans have not taken into account these effects. Privacy will be completely compromised and adding so many residences with so many vehicles will deteriorate the safety and tranquility of the area for generations of school children to come.</p> <ol style="list-style-type: none"> <li>1. Highways &amp; child safety concerns, in particular concerns in relation to the potential for vehicular conflicts with school drop offs/pick ups and with the movement of children along Guthrie Road, Northcote Road, College Road and The Avenue. I am concerned around the increased risk to child safety during pick up/ drop off from schools, caused by the excess traffic that this overly dense proposed housing area would create</li> <li>2. Concerns around the potential for overlooking into the school grounds and buildings- as a society we have a duty of care to protect children, and the current proposals do not allow such protection with the overlooking of school grounds enabling increased risk of predatory advances, photographs and targeting of specific children. The proposed plans totally subvert the existing harmony in which the school exists.</li> <li>3. The development will have a significant impact on the setting of school buildings which comprise important heritage assets as well as impacts on the character and appearance of the Conservation Area. This devalues the heritage of the school and surrounding area.</li> <li>4. The current proposals will have a negative impact on daylight/sunlight on school buildings which directly effects the learning of pupils, and in particular those that suffer from Seasonal Affective Disorder, and other mental health conditions.</li> <li>5. I have serious concerns around how construction would be managed and the significant impact this may have on the operation of the school during this period, which is likely to be extensive. - Dust is a major concern as many young children, mine included, suffer from Asthma and the resulting dust will be a major health concern for the young children attending school and playing sport outside. - Noise is a huge distraction for students at study and the gargantuan structures being proposed will require heavy digging &amp; noisy construction with heavy equipment. We object strongly to this application and request that it be modified into a more appropriate scheme.</li> </ol>	19-Jul-22
------	--	-----------

194.	<p>Objecting to a monstrous overdevelopment in a conservation area adjoining a school. The proposal seeks to triple the elevations of some of the existing buildings to then overlook school playgrounds, walkways and classrooms. Clifton College and buildings were designed by a legendary architect in Charles Hansom. The Zoo was also constructed in a sympathetic style to reflect the Clifton community and heritage. This proposal is not in keeping with any proportionality or sympathy for the existing neighbourhood and would ruin the nature of the area. In addition to the concerns for local school children, this proposal seeks to create the most densely populated area within Clifton which is renowned for being a historical setting without being encumbered by high rise blocks for which there is not sufficient road space to support. It is deeply inappropriate to position high rise housing with balconies overlooking school children and these plans have not taken into account these effects. Privacy will be completely compromised and adding so many residences with so many vehicles will deteriorate the safety and tranquility of the area for generations of school children to come.</p> <ol style="list-style-type: none"> <li>1. Highways &amp; child safety concerns, in particular concerns in relation to the potential for vehicular conflicts with school drop offs/pick ups and with the movement of children along Guthrie Road, Northcote Road, College Road and The Avenue. I am concerned around the increased risk to child safety during pick up/ drop off from schools, caused by the excess traffic that this overly dense proposed housing area would create</li> <li>2. Concerns around the potential for overlooking into the school grounds and buildings- as a society we have a duty of care to protect children, and the current proposals do not allow such protection with the overlooking of school grounds enabling increased risk of predatory advances, photographs and targeting of specific children. The proposed plans totally subvert the existing harmony in which the school exists.</li> <li>3. The development will have a significant impact on the setting of school buildings which comprise important heritage assets as well as impacts on the character and appearance of the Conservation Area. This devalues the heritage of the school and surrounding area.</li> <li>4. The current proposals will have a negative impact on daylight/sunlight on school buildings which directly effects the learning of pupils, and in particular those that suffer from Seasonal Affective Disorder, and other mental health conditions.</li> <li>5. I have serious concerns around how construction would be managed and the significant impact this may have on the operation of the school during this period, which is likely to be extensive. - Dust is a major concern as many young children, mine included, suffer from Asthma and the resulting dust will be a major health concern for the young children attending school and playing sport outside. - Noise is a huge distraction for students at study and the gargantuan structures being proposed will require heavy digging &amp; noisy construction with heavy equipment. We object strongly to this application and request that it be modified into a more appropriate scheme.</li> </ol>	19-Jul-22
------	--	-----------

195.	<p>I am worried with the current plans about the damage to the biodiversity of the area. The Root Protection Act also would be broken by this property development as the trees are mature in the zoo and would be unduly damaged/ killed by the building foundations. During a period where Bristol is leading the march on environmental issues (such as the recent Clean Air Zone) why are we destroying local vegetation in order to build properties not even in keeping with the local area. Clifton, Bristol is also known for its beauty and classical architecture. This development looks generic and quite frankly ugly, this would destroy part of the character of the area and would lead to a loss in appeal for tourism and new residents looking to join the area. I am also concerned about the affect this development would have to the wider area. Residents who already live in the surrounding area already have difficulty parking and accepting deliveries. There are not enough parking spaces in the new plan which would lead to even more traffic issues in the surrounding areas.</p>	19-Jul-22
196.	<p>The zoo is looking to maximise the value of its land sale and to leave us with a terrible legacy. The council's job should be to protect the interests of its citizens - but as has been seen with the zoo's other application for the west car park it seems to side with the interests of developers. The zoo's development plans for the west car park have only been halted through the dogged work of a number of local residents - I am guessing that same group will challenge any approval given for this application of the main site. We are being asked to accept a high density, high rise development that will despoil a beautiful environment. Who, other than the zoo and its developers, could possibly think that was a good idea? The bitter pill is being sweetened with some greenwash about the development and some public access to the gardens - that seems a terrible deal to me. I hope the council roundly reject these plans and force the zoo into radically changing their strategy.</p>	19-Jul-22
197.	<p>The proposed plans are not sympathetic to the existing gardens, the other properties in the vicinity. There is absolutely no thought involved to make it a beautiful space - the blocks of apartments around the perimeter are too high and frankly hideous in design. If you were going to go modern at least use lots of reflective glass and perhaps wood and dark metals to give it some elements of the existing site. And keep the elevations low in keeping with surrounding property. It's another example of greed over what's actually appropriate. I no longer live in Clifton but the Zoo was part of my life and it would be such a shame to change it into some towering monolithic complex with some pretty bits in the middle. I strongly suggest a rethink, I can't imagine any neighbouring residents are at all happy about it</p>	20-Jul-22

198.	The proposed plans are not sympathetic to the existing gardens, the other properties in the vicinity. There is absolutely no thought involved to make it a beautiful space - the blocks of apartments around the perimeter are too high and frankly hideous in design. If you were going to go modern at least use lots of reflective glass and perhaps wood and dark metals to give it some elements of the existing site. And keep the elevations low in keeping with surrounding property. It's another example of greed over what's actually appropriate. I no longer live in Clifton but the Zoo was part of my life and it would be such a shame to change it into some towering monolithic complex with some pretty bits in the middle. I strongly suggest a rethink, I can't imagine any neighbouring residents are at all happy about it	20-Jul-22
199.	I object to the this planning application as it will increase the density in an already overpopulated area. It will have an adverse effect on air quality, infrastructure, increase traffic and noise. The surrounding area is already in trouble: potholes, filthy roads, blocked drains and broken street lighting. KEEP THIS SITE AS A LEARNING CENTRE FOR BRISTOL'S CHILDREN.	20-Jul-22
200.	I fully support this application. The plans are well thought-out and provide a much needed stock of sustainable and low cost housing in the area. While it is undoubtedly sad to lose Bristol Zoo Gardens, the new scheme will provide a hugely valuable and biodiverse community area that can still be enjoyed by the public (and for free!). The historical and heritage-rich buildings will be preserved, and there will still be a conservation presence in terms of the new Clifton Conservation Hub. The current site of Bristol Zoo Gardens is highly dilapidated and needs an unsustainable level of funding to maintain it. The proposed plans offer the only sustainable way forward. 'NIMBY' objections hold little weight in this context as they are short-sighted and acknowledge the decline of the site (owing to insufficient visitors and investment)	20-Jul-22
201.	Whilst some internal aspects of the existing zoological grounds appear to be "preserved" under these plans, the negative impact of the development Far Far outweigh these few sympathetic elements. Apart from the enormous disruption the actual construction works will have on the neighbouring citizens, school pupils & staff, wildlife and visitors that support this community, once completed, it is clearly evident that ongoing everyday life for these groups will be detrimentally affected by the project as it is currently proposed. The impact on local traffic, for example, with pollution and safety concerns amongst other considerations, will be excessive in comparison to the area expected to cope with such a huge increase in volume. The immediate neighbourhood and wider Clifton community is a conservation area that is the council's responsibility to protect. Whilst we should be open minded to how buildings and towns need to evolve to support people and the environment, these proposals do not present benefits in either respect apart from pure number of "housing". And the volume of this is far too excessive for the local infrastructure to cope with. Additionally, the outlooks that will be created are not nearly sympathetic enough for a conservation area.	20-Jul-22

202.	The local infrastructure can not possibly support this development without major disruption to traffic, safety and pollution. The overdevelopment of this site is contrary to the principles of this conservation area The project is not sympathetic to the zoo's heritage or the Clifton community	20-Jul-22
203.	The housing is too dense and not in keeping with houses in the area. They are too close to the adjacent roads and too high. The development is not suitable for the general public to be able to use the facilities.	20-Jul-22
204.	Clifton has a housing style of architecture that its residents and visitors admire. The proposed housing on this site makes no attempt to blend in with our traditional buildings. The "boxy" elevations are, I consider, quite ugly. As they have car parking at ground level they are one floor higher than necessary. The higher buildings on Northcote Road and Guthrie Road will dominate these roads. The proposed public access comments by the developer sounds good but I cannot imagine the residents making these visitors welcome. Will there be any facilities for these visitors? Will there be any visitors wanting to visit with their picnic baskets and barbecues and sit on the lawns? Too many of the existing trees are being removed. I visited a new housing development in Bath a few years ago and there were virtually no parking places included on the site. Residents were expected to use public transport, taxis or car hire. Why are there over 100 car spaces being included in this scheme? Bristol has a real car transport problem. Why allow more cars into the City? Other uses for this site should be considered. They may not be as profitable for the Zoo but may benefit the residents of Bristol more.	20-Jul-22
205.	Dear planning committee, I write to support the planning application of the Bristol Zoological Society to redevelop the Bristol Zoo Gardens into a residential and community asset park. I support this development because: > It will provide high-quality housing in direct proximity to the green spaces of the Downs and existing public transport links, at a time when Bristol needs them so much, without trimming Bristol's green belt, attracting new residents and families to this part of the city. > The proposed plan will open access to the wonders of the gardens for free to residents and neighbors, I can't wait to visit it regularly. > The historic entrance of the site seems to be protected in the plan and this will leave a landmark of the old zoo on-site. If this entrance building becomes a cafe and a community space as it is planned, it will be an amazing space to socialize and rest which is really needed near the Downs nature reserve (we have been waiting for toilets to be built for ages) > The proceeds of the development will give the Bristol Zoological Society the resources needed to build a new Bristol Zoo, 10 times bigger with a new campus in Cribbs Causeway delivering a new world-leading visitor attraction with major benefit for the region and its economy. I hope you will allow this to happen. I would not understand if you would stop this project led by an internationally acclaimed charity focused on animal conservation. Thanks in advance for your consideration.	20-Jul-22



206.	The proposed plans are not sympathetic to the existing gardens, the other properties in the vicinity. There is absolutely no thought involved to make it a beautiful space - the blocks of apartments around the perimeter are too high and frankly hideous in design. If you were going to go modern at least use lots of reflective glass and perhaps wood and dark metals to give it some elements of the existing site. And keep the elevations low in keeping with surrounding property. It's another example of greed over what's actually appropriate. I no longer live in Clifton but the Zoo was part of my life and it would be such a shame to change it into some towering monolithic complex with some pretty bits in the middle. I strongly suggest a rethink, I can't imagine any neighbouring residents are at all happy about it	20-Jul-22
207.	The proposed plans are not sympathetic to the existing gardens, the other properties in the vicinity. There is absolutely no thought involved to make it a beautiful space - the blocks of apartments around the perimeter are too high and frankly hideous in design. If you were going to go modern at least use lots of reflective glass and perhaps wood and dark metals to give it some elements of the existing site. And keep the elevations low in keeping with surrounding property. It's another example of greed over what's actually appropriate. I no longer live in Clifton but the Zoo was part of my life and it would be such a shame to change it into some towering monolithic complex with some pretty bits in the middle. I strongly suggest a rethink, I can't imagine any neighbouring residents are at all happy about it	20-Jul-22
208.		21-Jul-22
209.		21-Jul-22

210.	<p>Morning Matthew, I hope you are well. We understand from Sinead McKendry of Savills that they have issued a clarification additional to our Objection dated January 2023, grateful if you could note our clients position in this light: 1) In our objection dated January 2023, we note that "A Visually Verified Montage (VVM) view has been provided from across the College playing fields (The Close), from the base of the Cricket Pavilion. However, this only demonstrates the outline of the proposed South Buildings along Guthrie Road with a height of 3 to 4 storeys and not the larger scale development that sits at a higher level, namely the proposed perimeter apartments that make up the North Buildings with a maximum height of 6 storeys or the East Buildings which range in height from 3 to 5 storeys." Our concern with the VVM is not simply the location it is taken from but rather what it does/does not show in terms of detail, notably we do not think it shows the full impact of the taller buildings on the BZG site on the College's Main Campus. As such our objection still stands. 2) In regard to Location we state the following in our objection dated January 2023, "Additionally, the proposed view included within the VVM is neither taken from the protected Local View (LC24) which runs from the south-west corner of the College's Grounds or the identified Long View (L25) as identified in the Clifton and Hotwells Conservation Area Character Appraisal (CACA) Important views and Landmark Buildings Map. Long views are long distance views across the City to key features or landmark buildings. In this instance Long View L25 stretches from the grounds of Clifton College northwards across the College and BZG site, both of which are identified within the CACA as Landmarks of City-wide importance. As a consequence of this the College consider the VVM does not accurately reflect those protected views, as identified in the CACA, and request an updated VVM which accurately reflects the impact of the proposals at the BZG site on Local View LC24 and Long View L25." The College did last year request that a VVM be taken from the School Grounds, however, this should not have discounted VVM's from the two identified CACA protected views, but rather added to these to ensure that a robust approach is taken to all views across the Conservation Area. Whilst the College's priority is to ensure that the College itself is duly considered in the Planning Process, as reflected in the attached email correspondence, this does not change the Policy position on protected views which are clear on where these are located and it is felt should have also been drawn from to provide comprehensive coverage across the entirety of Colleges main campus (in line with the CACA identified views). As such we consider our concerns to still be relevant and recommend that Historic England are asked to confirm that they are content with no VVMs of these protected views, in their assessment of the overall proposals. Additional to the above I would appreciate if you could confirm that the planning application is still on track for a decision on 15th March 2023 at Planning Committee or if the date has been pushed back in light of the additional commentary received. Kind regards, Beth Elisabeth Pywell MRTPI Senior Planner CBRE   Planning and Development</p>	21-Jul-22
211.	<p>I vehemently object to the proposed plans for the housing that will be built in place of Bristol Zoo. We live around the corner, on Apsley road. My son goes to Clifton College and I believe there is a strong case for the height of the proposed flats which would overlook the school grounds to be a huge safe guarding issue. One which I am very uncomfortable about. I am amazed it has even been suggested due to it being in a conservation area, and I would be appalled if the plans were agreed. Some of the proposed changes to the space I support, such as the gardens, and playground, which are respectful to the conservation area we live in. Thank you.</p>	21-Jul-22

212.	<p>I am writing to you concerning the proposed development of the Zoo gardens in Clifton and would like to make the following objections: 1. Highways safety concerns, in particular, concerns in relation to the potential for vehicular conflicts with school drop-offs/pick-ups and with the movement of Clifton College children along Guthrie Road, Northcote Road, College Road and The Avenue. 2. Concerns around the potential for overlooking into Clifton school grounds and buildings. 3. Safeguarding issues for Clifton College pupils. 4. Daylight/sunlight impacts on Clifton College school buildings. 5. Impacts on the setting of Clifton College school buildings which comprise important heritage assets as well as impacts on the character and appearance of the Conservation Area; 6. Concerns around how construction would be managed and any impacts this may have on the operation of the schools in the local area, in particular the close neighbouring school, Clifton College. 1. Highways safety concerns, in particular, concerns in relation to the potential for vehicular conflicts with school drop-offs/pick-ups and with the movement of children along Guthrie Road, Northcote Road, College Road and The Avenue. There are two large schools close to the zoo, Clifton High and Clifton College, which already create considerable congestion to the area at school dropping off and pick-up times. There is already an unacceptable amount of illegal parking, occasional drive blocking and 'frustrated driving' and the situation would become much worse. There is no mention of the soon-to-be ongoing development in the Zoo West car park off College Road. So, it is not just the 200 households as described in the Zoo gardens but the two developments together and considerably more households will add considerably more pressure on traffic congestion including parking. The area will become too densely populated and will lead to even more pressure for residents, the staff of Clifton College, Clifton High and the staff and patients at the nearby Pembroke Road surgery, who will all be competing for parking spaces with the residents and visitors to the new development. The area will be overdeveloped, especially with the development of the Zoo's West Car Park There is little provision for residents' and guests' parking within the planned development. There would be more households than allocated parking spaces. I object to the amount of traffic that will be generated around the local roads of the site by this volume of housing plus that of the West Car Park site. The increased volume of traffic will not only be detrimental to the air quality but will also cause a considerable safety concern for a large number of school children on foot walking to all the schools in the area. Bristol council would be showing a complete disregard for the safety of children if they proceed at this scale. This excess traffic is of concern for the safety of the pupils of Clifton College and Clifton High and Christchurch C of E Primary school. In particular, Clifton College pupils, who spend a lot of time each day walking between buildings in this area. The density of the development is too great to maintain public safety around this site. Clifton College also uses the area outside the Zoo in Guthrie Road for coaches on a daily basis to transport students to their sports grounds. How will this be possible if the development proceeds? There also seems to be no provision for social services (carers etc) attending to the elderly and others. 2. Concerns around the potential for overlooking Clifton school grounds and buildings. 3. Safeguarding issues for Clifton College pupils. 4. Daylight/sunlight impacts on Clifton College school buildings. 5. Impacts on the setting of Clifton College school buildings which comprise important heritage assets as well as impacts on the character and appearance of the Conservation Area; The proposed design plans will mean that Clifton College grounds and buildings will be overlooked. There are safeguarding issues for children playing in school playgrounds, looking into classrooms or walking between facilities on the large campus. These children will be overlooked and have</p>	21-Jul-22
------	---	-----------

the potential to be targeted or abused. This development does not consider the safeguarding and safety of children attending the schools close to the site. Children are often walking around the campus site of Clifton College, they will be unaccompanied by adults so are at risk of a road accident, particularly in the winter when it is dark. Clifton College is a co-ed boarding school there will be young pupils walking on the pavements and crossing roads in large numbers, as well as individuals late at night. There are many evening functions and boarding houses in the immediate area leaving students, particularly at risk. The proposed height of the developments is unacceptable to Clifton College and to the residents of Northcote Road, and College Road, with an increased lack of sunlight. I object to the design of the perimeter buildings. The surrounding roads will feel like dark alleyways. The scale and impact of the losses of daylight and sunlight for most of the neighbourhood adjacent to the Zoo have been significantly under-represented in the plans. The report provided by the Zoo's daylight and sunlight surveyors appears to include errors and omissions in the presentation of its data. The scale, height and proximity have resulted in numerous breaches of BRE planning guidelines for reductions in daylight and sunlight within the proposal adversely affecting many of the directly neighbouring properties, residents and children. The proposal to build 5 story buildings alongside Northcote road will significantly alter the character and charm. How is this possible in a conservation area? The area of Clifton has been designated a Conservation Area to protect it from developments like the one being proposed, so that it can remain unique. The proposed 5 & 6-story modern style buildings will dwarf the scale of current buildings and will dominate, as well as significantly harming the visual environment and the architectural beauty of the buildings of Clifton College. The architectural design does not take into account the surrounding historical buildings. The proposal does not take into consideration the close neighbours or show any regard for the functioning of Clifton College which is in such close proximity to the development. It will significantly reduce the sense of spaciousness and deprive people of the views of the sky, sunlight and views of mature trees as they live work and play in the neighbourhood. 6. Concerns around how construction would be managed and any impacts this may have on the operation of the schools in the local area, in particular the close neighbouring school, Clifton College. Given the lack of consideration in the aspect and overall plans, I would also be very concerned that the actual construction process itself has been equally poorly considered. The building works alone, which will take several years, will have a severe impact on the surrounding local schools. With construction likely taking place throughout the school year and in particular through the periods of public exams, it will bring disruption, increase traffic and a lot of noise. This will heavily disrupt the safe running of the school and affect the education and examinations of hundreds of students. This following several years of Covid disruption which these students have already suffered. We cannot support a development that will heavily disrupt the education and examinations of hundreds of students, during particularly difficult years when results are re-normalised. This does not seem to have been considered by these developers. Finally, I object to the view of the site from the Downs with 6-storey tall buildings built up to the boundary wall. The frontage should be no more than the current two-storey height. I don't believe the original garden will be welcoming to the public. The layout of the site, with overly tall buildings around its perimeter, and narrow gated access will make it seem private. There is no similarity to the amenity of the current zoo gardens. There will be a loss of many mature tree species There does not seem any guarantee that once the development is completed that public access will be maintained to the

	<p>gardens in the long term. On the basis of all these concerns, I would like to record a strong objection to the plans as presented.</p>	
213.	<p>Absolute disgrace. The zoo (and anyone else associated with this proposal) should be ashamed of these plans - clearly out to maximise profit with no consideration for anyone else. This should never be allowed to happen and if the City planning department lets anything like this through they should be ashamed too. It is totally out of keeping for the area, destroying a beautiful place in a conservation area with dreadful edifices which don't fit in. It is not wanted and not needed, totally unfair on the local residents, and the safety and safeguarding concerns of the development and the tall buildings overlooking a school is significant.</p>	22-Jul-22

214.	<p>This is a dreadful proposal in so many ways. It would mean too many people living on what is a relatively small site. This in turn will generate much unwanted traffic on already busy surrounding roads. The perimeter building designs are hideous and far too large, completely out of character for the area and far too imposing for the residents adjacent to the site. There is no consideration for the site's neighbours, in terms of traffic flow and also there would be major disruption during construction. Apartments overlooking a school lead to safeguarding concerns, as well as concerns of road safety &amp; pollution. In the proposal, the gardens are to be kept for the public, but why would 'the public' visit such a confined ugly site, which would be effectively a private housing estate. Also the removal of several trees etc. is not showing much protection for this side of the proposal and the surrounding buildings would detract from them anyway. For an organisation so committed to the environment and ecological issues, this is an embarrassing proposal which disregards these values for the surrounding area. It just looks like a planning application looking at profiteering rather than considering any impact on the surroundings and is irresponsible. Even if this is refused and a smaller design is resubmitted, it would still be an inappropriate proposal for the regeneration of the site.</p>	22-Jul-22
215.	<p>So many new documents added but I would suggest deliberately uploaded separately so that people don't have the time to go through each in detail. What is obvious though is that the plan is still to build 4/5 stories overlooking the Pre Prep and Prep schools and that residents of this new development would be able to spend all day looking at children should they wish which is very concerning. There is no comment in the plans and multiple other docs to address the safeguarding concerns of parents of Clifton College Pupils and the Developments proposed height will be an eyesore in amongst the Older period buildings. This looks like a plan out of the 70's where anything goes and are we so desperate for housing that all rules go out the window. To summarise: 1. Why shouldn't children attending Clifton College have the right to feel safe? 2. Why is it ok to build something so out of place with the area? Cannot believe this has even reached this stage but then we are talking about a Labour run Council!</p>	22-Jul-22
216.	<p>My Son goes to school at Clifton College and I have a interest in the area as my family live in Stoke Bishop and lots of our friends live very close to this proposed development. These plans are terrible and very short sighted and greedy. The dwellings planned will make the local area look hideous and the security and privacy of pupils of Clifton College have been completely overlooked in the pursuit of money.</p>	22-Jul-22
217.	<p>Who thought up these plans? Terrible idea to have 5/6 story buildings overlooking a school full of children. Children should go to school feeling safe, not visible to anyone who lives in floor 4 upwards at all times. This is just pure greed. Not to mention the impact on local infrastructure and traffic surrounding the school.</p>	22-Jul-22

218.	Having seen the plans displayed I believe the proposed development will provide much needed housing in Clifton and also create a beautiful park for the use of Clifton residents, who at present can only appreciate the grounds of Bristol Zoo if they are visitors. Modern housing designed with the environment in mind from the start is a great upgrade on much of Clifton housing, which tends to be much older and almost certainly energy inefficient compared to modern buildings.	22-Jul-22
219.	Whilst I think this will be the very best use of this area, I also think that the number of parking spaces MUST be adequate for the number of residential units being built. I feel Guthrie road should be upgraded even if this means taking a bit of the downs and that the type of housing should be affordable, not just for very well off people from the Clifton area but also for ordinary folk or even to house some of the homeless.	23-Jul-22
220.	Private housing build type along some perimeters of the Zoo appears to be featureless in design and lack sympathetic character as was to be expected. Would like to have seen the use of pitched roofs also. Richard Coles BSG ex-employee/current volunteer	23-Jul-22
221.		25-Jul-22
222.	I personally think that it is terrible that fellow parents and the College have mounted such a petty organised assault on the zoo's plans. From all of the information that I have been able to find it would appear that the plans put forward are robust and I for one fully support them in their enterprising efforts to build more houses whilst keeping their beautiful gardens open into the future.	25-Jul-22
223.	This application ensures that the land will still be accessible to the general public to enjoy and will create welcoming community spaces and play areas.	25-Jul-22

224.	<p>I have loved visiting the zoo since I was a little girl, as did my parents and grandparents. There are fond stories from each generation of my family and I look forward to visiting the new site at Wildspace and starting more memories there in due course. While I grew up on the outskirts of the city I now live and work in Clifton, it is my home. I am sincerely disappointed with these plans. I am perhaps biased - I fell in love with the Our world Bristol idea being supported by the Eden Project and backed by local businesses to create the Worlds First Virtual Reality Zoo and Gardens. These plans have my backing as true vision for the future and cementing a Bristol Zoo legacy while increasing the gardens size. My two criticisms: out of character designs for the area and the loss of nearly 45% of the 381 trees. But putting my perhaps bias aside I do have concerns for these plans the architecture doesn't fit in with surrounding buildings. The neighbouring houses are dominantly Georgian and Victorian structures, while the building designs here are modern and the character in my opinion would be lost. If you are building in such a historic area there needs to be more sympathetic to the neighbouring designs. The gardens have been lovingly planted and looked after for 180 + years, they have been planted like the Westonbirt Abroteum - they are meant to be viewed together and were landscaped purposely for the backdrop of the zoo. The loss of nearly 45% of the trees is unacceptable in a modern city like Bristol during an acknowledged Climate crisis. There is 381 trees in the Bristol Zoo gardens and nearly 45% of the trees would be felled with these deigns and the remaining trees would be put at risk due to their root systems likely being damaged during the construction phase that it is likely the loss would be far greater than 45%. The loss of biodiversity and canopy cover would be felt and noticed for residents. It is estimated there would be a biodiversity net loss of 22% by the Bristol Tree Forum rather than the net gain of 36% they are proposing. I question some of their maths in the application, which doesn't add up and call for an independent calculation. These gardens have been a part of the city since 1836 and they have been lovingly maintained by the zoo - the trees in the zoo gardens are noted nationally (champion trees from the gardens are included on the national register) and internationally recognised too and should not be felled or put at risk. This is not the legacy the zoo should leave behind in its home of over 180 years - it has a responsibility to practice what they preach. Losing this many trees will negatively affect the tree canopy cover in the area. While the Clifton ward has one of the best tree canopy covers in Bristol, it is still under the recommended tree canopy cover for a healthy city of 30%. We need to be prioritising existing mature trees while planting new ones, mature trees have larger canopy cover than newly planted trees. (Replacing a 100 year old tree with new sapling will not cover the loss of habitat, biodiversity or canopy cover and thus carbon intake.) Also there is no tree planting sites remaining in Clifton or Clifton Down - the area would lose this canopy cover and trees altogether. The Zoo charity has a responsibility to Bristol residents and neighbours to provide best value, this is not exclusive to price from property developers but best decision to seal their legacy and to leave behind something worthwhile. I have read both the Clifton and Hotwells Improvement Society response and the Bristol Tree Forum's response and am concerned with the zoos current application. The trees should be awarded TPO's and protected, the plans need to be re-thought out so 90% of the trees are retained.</p>	26-Jul-22
------	--	-----------



225.	<p>Actually very disappointed with these designs. I understand the zoo wants to make a hefty profit from property developers but as someone who has been their neighbour for a significant number of years I feel they are letting us down. I have read comments made by the Clifton and Hotwells Improvement Society, Bristol Tree Forum, Historic England, CAP and a number of local people within Bristol boundary. Most comments are in favour for the relocation of the zoo, while it is a much beloved part of our city the need for bigger enclosures so the animals have a better quality of life has been much needed for a long time. However, most comments are not in favour of these designs and plans. They lack imagination and do not fit in to the conservation area it is in. The designs are disappointing and will soon become an eye sore within the Georgian and Victorian community it is surrounded by. As many residents already struggle with parking and deliveries things will only get worse. It feels Bristol is a leader for the environment, we were the green capitol in 2015, we led cities in the UK to acknowledge the Climate crisis, Greta Thunberg gave a speech to the masses here just before the lockdowns. Why with a disappearing tree canopy across our city are we entertaining plans that do not respect our beliefs and mature and ancient trees. Nearly 45 % trees look to be felled under these plans, yet the actual number will be much higher - many roots will be destroyed or damaged in construction and their root protection acts won't be upheld. The transplant of several trees idea is a lovely idea but the success rate of trees being moved is low but won't be seen for several years. It is likely out of the hundreds of trees it is likely 70% + trees will be felled or die. It is outrageous the area will lose so much biodiversity, mature and ancient tree canopy cover and the designs to be destroyed and not replaced in the area - as there are no available tree planting pits in the Clifton, Clifton Down wards on the Bristol City Council website. Marvin Rees, councillor for property development should be disappointed for these plans. I reject these proposals. I welcome new plans with a better understanding for the area and more respect for the nature and the gardens they want to be built on.</p>	26-Jul-22
226.	<p>Objection - full Reasons for objection: 1. Harm to the overall historic interest and significance of the site 2. Loss of the Communal Value The plans do not address the need for more local and accessible green spaces (to address the increasing mental and physical health issues). The plans do not preserve all the mature trees and shrubs (valuable assets to address climate change issues). 3. Does not reflect the dilution of UK Government's housing targets. The proposal (for a housing development) does not reflect the relaxation in the UK Government's housing plan - aka 'dilution of the housing targets' (6/12/2022). This UK government decision to be more flexible / realistic with housing targets has been made specifically to protect key sites in areas of historic interest (e.g. Clifton), which the Government has now realised are at risk of inappropriate housing developments. 4. Squandering of a public space The proposal (for a housing development) does not reflect the concerns that 'some public spaces are being squandered' (Michael Gove, MP, (27/12/2022)</p>	26-Jul-22

227.	<p>Objection - full Any potential housing development on the former Bristol Zoo Gardens and West Car park site is totally inappropriate usage of this unique green site with it's cultural and historical significance, in a conservation area. In the 1960's Bristol Zoo was apparently very fortunate to be gifted a very large part of the former Hollywood Estate (164 acres), (now developed as Bristol Zoo's 'Wild Place'). Generosity of this kind is highly commendable. The Zoo Trustees should consider echoing this historic generosity, together with the support given to the Zoo by Bristol's citizens over the last 186 years, by gifting the whole site (Zoo Gardens and Zoo West Car Park) to the 'Citizens of Bristol for ever in perpetuity', - effectively as an extension to the Clifton and Durham Downs. Gifting the whole site to the Citizens of Bristol is something that the former Zoo and all Bristol citizens would be proud of for centuries. (The Zoo Trustees would make a significant 'profit' as a result of such a generous gift, as the on-going maintenance of the grounds and existing structures, would immediately cease. )</p>	26-Jul-22
228.	<p>Objection A) The Bristol Zoo Gardens and the adjacent (Bristol Zoo) West Car Park individual planning applications (22/02737/F and 21/01999/F) should be withdrawn and only reconsidered as a single site. The combined site has significant historic interest, a large number of mature trees, superb gardens, a large percentage of green space and historic walls. B) Treating the Bristol Zoo Gardens and Bristol Zoo West Car Park as potential housing development site(s) is totally inappropriate use of the historic site(s). This is a once-in-a-lifetime opportunity for Bristol City to actively demonstrate a commitment to the ever increasing need for more green spaces for the mental health, physical health and well-being of citizens. The Downs (the green space, adjacent to the Zoo) has seen an unprecedented increase in usage in recent years. This is an opportunity for the City of Bristol (together with the Downs Committee, Merchant Venturers, Bristol University, etc.) to invest in the long-term future of Bristol citizens, by expanding the Downs green space, thereby making the ex-Zoo sites accessible to all citizens 'for ever hereafter' (i.e. consider protecting the Zoo site along the same basis as the Downs is protected). A precedent has already been set, as the Zoo's North Car Park site, has apparently already been reclaimed by the Downs.</p>	26-Jul-22

229.	I work at Clifton College and with over 200 new homes opposite the school traffic and parking will become a major problem. College road, the Avenue and Guthrie road will have queuing traffic, especially at school drop off/pick up times. On street parking will be reduced if the public wish to park and go to the zoo gardens and café. The site is over developed and the planned new houses are not in keeping with the surrounding houses most of which date from the time on or after the school was built in 1862. There will be overlooking from the new houses into school buildings and this raises safeguarding concerns. Pupils walk on all of the roads around school going to and from lessons and there will be road safety concerns with increased traffic from the new site. Many trees will be lost during the demolition process and the green public space in the centre will end up being taken over by the residents as people will not want to visit gardens in the middle of a housing estate. During the building process there will be inevitable noise and disruption to the school and all local residents.	29-Jul-22
230.	I work at Clifton College and with over 200 new homes opposite the school traffic and parking will become a major problem. College road, the Avenue and Guthrie road will have queuing traffic, especially at school drop off/pick up times. On street parking will be reduced if the public wish to park and go to the zoo gardens and café. The site is over developed and the planned new houses are not in keeping with the surrounding houses most of which date from the time on or after the school was built in 1862. There will be overlooking from the new houses into school buildings and this raises safeguarding concerns. Pupils walk on all of the roads around school going to and from lessons and there will be road safety concerns with increased traffic from the new site. Many trees will be lost during the demolition process and the green public space in the centre will end up being taken over by the residents as people will not want to visit gardens in the middle of a housing estate. During the building process there will be inevitable noise and disruption to the school and all local residents.	29-Jul-22
231.	I work at Clifton College and with over 200 new homes opposite the school traffic and parking will become a major problem. College road, the Avenue and Guthrie road will have queuing traffic, especially at school drop off/pick up times. On street parking will be reduced if the public wish to park and go to the zoo gardens and café. The site is over developed and the planned new houses are not in keeping with the surrounding houses most of which date from the time on or after the school was built in 1862. There will be overlooking from the new houses into school buildings and this raises safeguarding concerns. Pupils walk on all of the roads around school going to and from lessons and there will be road safety concerns with increased traffic from the new site. Many trees will be lost during the demolition process and the green public space in the centre will end up being taken over by the residents as people will not want to visit gardens in the middle of a housing estate. During the building process there will be inevitable noise and disruption to the school and all local residents.	29-Jul-22

232.	<p>I work at Clifton College and with over 200 new homes opposite the school traffic and parking will become a major problem. College road, the Avenue and Guthrie road will have queuing traffic, especially at school drop off/pick up times. On street parking will be reduced if the public wish to park and go to the zoo gardens and café. The site is over developed and the planned new houses are not in keeping with the surrounding houses most of which date from the time on or after the school was built in 1862. There will be overlooking from the new houses into school buildings and this raises safeguarding concerns. Pupils walk on all of the roads around school going to and from lessons and there will be road safety concerns with increased traffic from the new site. Many trees will be lost during the demolition process and the green public space in the centre will end up being taken over by the residents as people will not want to visit gardens in the middle of a housing estate. During the building process there will be inevitable noise and disruption to the school and all local residents.</p>	29-Jul-22
233.	<p>I write concerning the planning application above re the proposed development of the Bristol Zoo site. I moved to Bristol in 1981 and was fortunate enough to be a master at Clifton College. A post I stayed in for 34 years. The Zoo was an integral part of the College and was enjoyed by many college students, masters/mistresses alike. I understand that the Zoo would want to capitalise on the sale, but the proposed design seems to want to cram as many people in as possible. The buildings are far too high and not in keeping with the surrounding properties. Along with people come cars and pressure on amenities. Doctors, dentists and parking. It is the aesthetics in design which need to be addressed and to be realistic about what the area could feasibly tolerate in a population hike. It is for these reasons that I most strongly object to the planning application cited above.</p>	01-Aug-22
234.	<p>I am a local architect and consider this to be a good design in very many respects except for one, and that is the height of the perimeter flats along the lower half of Northcote Road and along Guthrie Road. As is clear from page 68 of the Design and Access Statement, the proposed blocks of flats in these locations are between about 4m and 6m higher than the existing buildings across the street from them. There is no good reason why we should accept that this represents good urban design. Put very simply, the flats in question would fit their immediate environment better by being 1 storey lower. The general height of buildings in those areas, when so clearly consistent and long established, should be respected and conformed to. Higher opposite the Downs works fine, but not where I have identified in this objection. It is no justification to point to the overall density of the proposals being in line or even below expectations or targets generally accepted for this type of development, because to reduce overall density merely reduces land value and there are good design reasons, well articulated by the designers, why more of the site is not built on. So, in short, I hope the planners will focus on this aspect of the design and agree with my objection, and I hope that this scheme, so good in so many other respects, can be amended, approved and built without too much fuss and too much delay.</p>	01-Aug-22

235.	The proposals for Bristol Zoo will spoil the open feel and make it look like a prison. The buildings are ugly and will not enhance this lovely piece of natural area. If these residences are built there will be congestion all around this area. It is busy enough now but this will lead to an enhancement of traffic which will then build up further into Clifton. I am totally against this proposal.	03-Aug-22
236.	<p>These proposals (a) are wholly unsympathetic, unsuitable and incongruent in scale, mass, form and design for a unique Conservation Area; (b) would overwhelm the proposed community garden and all the surrounding buildings. Note the professionally produced visualisations which have been commissioned by local residents. (c) are contrary to the National Planning Policy Framework and the statutory obligation to ensure that proposed development preserves or enhances the character of the Conservation Area; (d) will never attract people from across Bristol. (Who would want to come and see gardens in the middle of an upmarket housing estate?); (e) come nowhere near satisfying the requirements of sustainable design; and (f) present insuperable safeguarding and, because of the traffic they will generate, serious Health and Safety problems for the children of the adjoining school; They would do enormous damage done to the Conservation Area. They represent a thoroughly inappropriate legacy for the Zoo to leave after 186 years, particularly bearing in mind alternative options for the use of the site. A luxury housing estate some six stories high may, financially, be the best option for the Zoo but it would represent a disaster for the City of Bristol. It would allow the Zoo to sell the Gardens to a property developer for an estimated £40 million when it could easily adopt one of the alternative options that are available and which would enable the site to be developed in a sustainable manner and one which respects the integrity of the Conservation Area. The Committee is under no obligation to support an organisation which is in any event abandoning the City and has transformed itself from a conservation charity into, frankly, a greedy developer. The Zoo routinely claims made that the site will provide 'desperately needed housing' but this idea is risible. It is housing at the lower end of the scale that is needed in Bristol while the apartments proposed at the Zoo will be sold as luxury flats. The current design includes '20% affordable housing.' This is, most definitely, not social housing - but 80% of market rent and well out of range for key workers. If this scheme is approved there will be substituted for the iconic gardens of which the people of Bristol are rightly proud a series of ghastly, unimaginative tower blocks which will forever represent an ugly blot on the landscape. Future generations will wonder how this can possibly have been allowed. ;</p>	05-Aug-22

237.	<p>I object most strongly to this application. I do so for the following reasons: 1. Design. The Heritage Statement submitted in support of the application makes the following claim: 'the introduction of bespoke, bold architecture into this historically separate and different site will have negligible impact to [sic] the setting of the listed buildings of Clifton College, nor to its locally-listed buildings along Guthrie, College and Northcote Roads.' Nothing could be further from the truth. The shoe-horning of 5 and 6 storey perimeter blocks of flats of monolithic design lacking in any finesse is wholly out of keeping with the robust rhythm of weighty Victorian villas, constructed predominantly from dressed rubble and Bath stone detailing, that are the feature of the surrounding buildings. The proposals fail to take any account of the height, scale, massing, shape, form or proportion of the existing buildings, skylines and roofscapes. They cannot conceivably be said to satisfy the test of preserving or enhancing the character of the Conservation Area. 2. Daylight and sunlight. The overwhelming design of the tower blocks will impact significantly on the daylight and sunlight of the surrounding buildings. I support the objections of the residents of Northcote Road and Clifton College. 3. Traffic. The scheme involves the creation of 201 residential units. This will result in a significant increase in traffic with consequential effects on pedestrian safety and substantial pressure on on-street parking. The concerns of Clifton College and of the residents in Northcote Road are entirely justified. 4. Embodied carbon. The design means that the embodied carbon and greenhouse gas emissions (that is the energy generated and greenhouse gas emitted, associated with the materials and construction process) will be far above what is recommended. Giving consent to this proposal would be wholly inconsistent with the Council's declaration of a climate emergency. 5. Charitable status. The Zoo trustees are on record as saying that they have a responsibility to achieve maximum PRICE for the land. That is wholly wrong. Their responsibility is to achieve best VALUE in accordance with their charitable purposes which include a responsibility for environmental concerns - a matter which has been pointed out to them on numerous occasions and consistently ignored.</p>	05-Aug-22
238.	<p>All the new properties should have covered balconies. Surely we learnt that during the pandemic, and makes them feel so much more airy, accessible, environmental (plants), communal and practical. Could envisage buying one of the new properties, as this is potentially a lovely development, but only if with a balcony (or terrace if ground floor).</p>	07-Aug-22
239.	<p>just make all the apartments with a covered balcony/terrace - so much better for enjoyment of the outdoors</p>	07-Aug-22
240.	<p>support it if they all have covered balconies, would make it lovely.</p>	07-Aug-22
241.	<p>buildings could be more attractive - more glass, more balconies</p>	07-Aug-22
242.	<p>Looks like a fabulous idea. However I would propose 2 things: Firstly that almost all the properties have a covered balcony - so much nicer to live in and environmentally sound - covered to provide an outside space even in inclement weather. Secondly - consider stone/brickwork as used in the Redland Girls School development (Bath stone?) Which looks lovely and in keeping with the area. Some indication of likely prices of resulting properties would be interesting please.</p>	07-Aug-22

243.	<p>To confirm my objection to current proposals as follows:- Concept: It's unfair to argue this project must be approved/ accepted on the basis its a requirement of a hard to argue mission statement "Saving Wildlife Together" It's unlikely to find anyone in Bristol &amp; further afield that wouldn't support saving wildlife Design: A huge scale, bulky 5 &amp; 6 storey project encircling &amp; overwhelming historic gardens &amp; retained buildings isn't sympathetic Images illustrate a project that appears more to do with a time-share apartment, hotel/ center parc development Proposals fail to grasp the beauty &amp; timeless architecture of a Clifton &amp; Hotwells context - streets, squares &amp; terraces that have informed many urban design projects across the world. Furthermore glib giraffe &amp; elephant graphics on blank gable facades are a legacy in the Conservation Area that won't stand the test of time A design that reflects the scale, materials, architecture &amp; urban streetscape of Clifton &amp; Hotwells would be easier to understand &amp; support Environmental: The immediate site area is a vehicle gridlock - especially mornings &amp; afternoons &amp; it's hard to comprehend how a proposal to create over 200 properties won't exacerbate the problem The drawings, as presented, are difficult to understand/ grasp in terms of vehicular access, egress &amp; parking It appears the scheme relies on an extensive shared inner "ring-road" for traffic circulation although images don't illustrate any vehicles or day to day site/ context reality (?) An easy to follow study needs to be undertaken so existing &amp; proposed residents understand the noise impact of heat pumps, vehicles (including motorbikes &amp; performance cars) under-croft car-parks, public events &amp; open access space within a walled, 5/ 6 storey building setting Given the impact of climate change it would be helpful to understand how pv panel/ green roofs are to be maintained on a practical level for example will high level access arrangements &amp; perimeter details grow as the scheme evolves (?) Conclusion: After 185 years the zoo has decided to leave Clifton &amp; their decision isn't unreasonable However, it's more than reasonable for Clifton &amp; Hotwells to have a project that isn't based on a flawed nostalgic philosophy &amp; inappropriate design model</p>	07-Aug-22
244.	<p>Please note that the Zoo site is in a conservation area with many notable listed buildings nearby. It is a heritage site of importance and distinction: Problems: 1. 2001 homes is too many on a site of this size 2. Parking for 100 cars is insufficient 3.The modern design is inappropriate and unimaginative 4. The buildings are too high and will dominate the area 5.Important trees will be lost 6. When the Zoo closes First Bus may well reroute the No 8 bus so there is no stop near the Zoo site I strongly object to the current proposed plans</p>	07-Aug-22

245.	<p>Re: Objection to Bristol Zoo Society's planning application to turn its Clifton site into a housing estate 22/02737/F I was very sad to see the proposal to turn Bristol Zoo into a housing estate. I write in objection to this planning application as someone who has grown up, lived and worked in Bristol, enjoyed the zoo as a child and has taken my own family there regularly in more recent years. I am also a scientist, author and broadcaster, and I have been Patron of Twycross Zoo in the West Midlands for more than a decade, so I have very good insights into the challenges - and opportunities - facing zoos in the 21st century. It is important to be very clear about what is at stake here, and what the proposal contained in the planning application really means. It means the loss of a huge cultural asset for Clifton and Bristol more widely. At a time when we should be promoting sustainable travel and green spaces, and building our cities accordingly, it means the loss of a place in the city that could be easily walked and cycled to. It means the loss of a place where people could learn about biodiversity and conservation. And ultimately, it means the selling off of a much loved attraction in Bristol in order to bankroll the expansion of another attraction in South Gloucestershire. The proposal includes 201 new homes, in five- and six-storey blocks of brick-built flats - taller than anything around them, and completely unsympathetic to the surrounding architecture - and parking for 124 cars. Many mature trees will be felled to make way for more concrete and tarmac. Is this what Clifton really needs, rather than a place where families could come to learn about nature, and enjoy green space? The application somewhat fancifully suggests that the public will still be able to enjoy the fragment of the botanical gardens that is left. But who will really feel welcome walking in between those tall flats into what will surely feel like a private garden (and will probably become one once new residents become dissatisfied with this sharing of space)? This is an important change of use for a green and educational space in the city of Bristol. The planning decision will be important not just for this site, but for what it signals about Bristol itself - a city which prides itself on its green credentials and green spaces, and its educational and cultural assets. The planning decision about this proposal to turn Bristol's zoological and botanical gardens into a housing estate must, of course, be considered completely separately from the funding requirements for the Wild Place attraction in South Gloucestershire. Professor Alice Roberts North Somerset</p>	09-Aug-22
246.	<p>I cannot see a significant difference between the revised and original plans, which I have already objected to. These plans are for an up market housing estate with few units large enough to accommodate families. There are already plenty of similar sized apartments in Clifton available to buy or rent. The design of the blocks is totally out of character with the surrounding conservation area. It is unlikely that the gardens, which will initially be available for public use, will remain so in the future. Many trees will be cut down. The herbaceous border within the zoo gardens, will be bulldozed, in spite of it being award winning and also, over the years, has had the ashes of loved ones scattered on its soil, with the zoo's permission. The twenty per cent of affordable units will still be too expensive for key workers, at eighty percent of their market price. Some wealthy developer will gain from these plans, not the people of Bristol.</p>	10-Aug-22



247.	<p>I object to the proposed plan because: The proposed medium rise buildings are out of character with the surrounding area. 'Affordable ' and 'for social rent' are not defined in the plans. Few houses, as opposed to flats, are planned. Those that are, will no doubt be astronomically expensive as houses in Clifton always are. This debunks the claim that the zoo sale will provide, admittedly, much needed housing ie houses, not flats, in Bristol. There are already plenty of flats available for private rent in Clifton , at similar prices to other parts of the city. Only some of the accommodation that is planned will have access to on road or off road parking. Although the bus service has improved, this means that the accommodation is less likely to be suitable for families. The proposal that the residents' service charges will fund the upkeep of the public garden is unsustainable in the long, or even medium term . Only a small proportion of the beautiful and historic gardens are to be retained, presumably the lawn and other easy to maintain areas. Instead of planning permission for an inner city, densely populated housing estate , the council should have bought or helped to buy the site to keep the gardens, accessible to the public for a small annual fee. Alternatively a body, such as English Heritage it the National Trust could have taken over the gardens.</p>	10-Aug-22
248.	<p>Dear Development Management Team Re: Bristol Zoo Gardens - Application 22/0737/F - Objection to Bristol Zoo Planning As a deeply concerned resident of 6 Northcote Rd and unofficial "Chair of the Northcote Rd Residents Association" I object to the above application on several grounds. I am not an expert but have tried to read and understand the 200 documents provided as best I can and their implications. If I have unwittingly misinterpreted anything I hope allowance will be made for this. I also hope there will be plenty more time to get independent expert advice and for more genuine dialogue and consideration to be given before any decisions are made. Key General Objections and Comments: 1. The sheer scale, length, height and form of the proposed perimeter residential blocks as it currently stands will significantly damage rather than preserve or enhance the character of this beautiful, historic Clifton Conservation Area in general, beyond the Zoo Gardens. It will dominate and intrude into the local neighbourhood in the adjacent streets. It will significantly reduce the sense of spaciousness and residential and visual amenity that is currently a feature of this area. It will significantly deprive people of the views of sky, sunlight and the glimpses of mature trees as they live work and play (the children in Clifton College) in the neighbourhood. 2. These same characteristics of scale, height and proximity have resulted in numerous breaches of BRE planning guidelines for reductions in daylight and sunlight within the proposal adversely affecting many of the directly neighbouring properties, residents and children. This is already causing many people significant stress and worry about a real deterioration in their living and home working environments. The scale and impact of the losses of daylight and sunlight for most of the neighbourhood adjacent to the Zoo has been significantly under-represented. The report provided by the Zoo's daylight and sunlight surveyors appears to include many significant errors and numerous omissions in the presentation of its data. However, if this scheme were approved, based on the data presented and contained within the reports it appears there will be significantly darker and gloomier winters for much of the neighbourhood and almost all of the adjacent residents. This is contrary to impressions implied by the surveyors' written conclusions. In an environment when we are increasingly understanding the importance of mental health and wellbeing</p>	14-Aug-22

	<p>for adults and children and we are aware of the vital importance of daylight and sunlight, surely we should not be choosing to breach BRE guidance in such an important aspect merely to aid additional profit for the few. 3. The scheme does not appear to be as environmentally positive as implied which is extremely disappointing for a proposal from the Zoo. 4. The suggestion that a few access entrances will make the gardens a wonderful unique community asset that many people beyond the neighbours will visit, seems overplayed in an area where the magnificent Clifton Downs are adjacent. 5. Although the scheme clearly satisfies the planning requirements for social housing there would seem to be very little social benefit that a 20% price reduction on price and 30% reduction on rents in c.40 Clifton properties (built over several years) which command almost twice the price of other properties in many other parts of the city. Thus, this development should not be considered as a major social benefit nor a reason to build an unnecessary large numbers of homes to maximise the profits for the Zoo if it is to the immediate and permanent detriment of the local community and the historic character of the conservation area. This is especially true when there are so many more and better located brownfield sites elsewhere that can build higher quantities of more affordable housing. 6. Even if permission were given for a reduced scale of lower level housing to a more environmentally suitable scale (perhaps 50%) one questions whether this really is the best use of such an absolutely unique heritage 12 acres site. No matter how nicely it is dressed up, the greater likelihood is that this proposed development will simply become a pleasant, affluent housing estate with some nice gardens and a nod to social housing. It will not really do anything to help the less well off and most needy, nor will it contribute anything substantial to the housing shortage. It will perhaps provide c.60 new homes per year, (12 "affordable") with the first phase completed in 3-4 years' time. Neither will it provide much of significant benefit to remaining non-Clifton Bristol residents. Overall, the development seems much more likely to leave a permanent, unwanted and "visible legacy of darkness" for its neighbours depriving them of far more pleasure and amenity in the short and long term than it will ever return. Without being a planning expert but just by walking around the perimeter it is fairly easy to imagine that many of these problems and most of these objections might be resolved - quite simply, by reducing the existing heights of all the blocks of flats by two storeys around the entire perimeter. Of course, this would limit the potential profit from this particular development and this particular site. However, this profit can only be realised and is only significantly increased by the agreement for change of usage to allow the development of high value housing. This is why we very much hope and are relying on Bristol City Council to make the right long term decision for both Clifton and Bristol. Its role is not to maximise profit for developers. If it does make the right decision then it can help ensure the Zoo and its trustees do leave a legacy they can be proud of rather than a "dark legacy of resentment" to the Clifton Community in which the Zoo has resided for over 150 years. If this current application were approved the latter legacy would seem to be the more likely outcome. The Northcote residents have been very frustrated, disappointed and distressed that the zoo planning team have pursued this planning application with such apparent disregard for the clearly expressed concerns and constructive suggestions made during consultations with their neighbours. The Zoo team have produced a number of impressive professional documents in support of their proposal. However, these appear to provide a rather flattering gloss over the plan's defects and its limitations and impacts. The zoo has repeatedly made it clear to us that the planning application has been submitted with the intention of extracting</p>	
--	--	--

the maximum potential value for the site, albeit within a significant number of constraints due to the special and unique historic characteristics of this site. This proposed plan demonstrates that intent very clearly. More Specific Detailed Objections and Comments: Breaches in BRE guidance for Daylight and Sunlight: Devla Patman Redler report The Zoo team's Savills surveyor has admitted that these surveys are something of a "dark art" so I thought I would look at these closely upon the advice of a professional planning consultant. It was pointed out that surveyors are unlikely to produce reports for their clients which suggest that the proposed scheme's viability is threatened as a result of breaches in the BRE guidance on light reductions. Disturbingly, there appear to be a significant number of clear errors and even large numbers of omissions in at least some of their tables of source data provided in their appendices. By using N/A in certain rows of their appendices they have omitted to show and include many dozens of windows that that experience adverse effects of greater than 20% reduction for the Vertical Sky Component and 20% reduction in the Annual Probable Sunlight Hours. Each of these 20% reductions in light represents a breach of BRE guidance. I estimate there are many dozens of errors and possibly hundreds of omissions. This has resulted in significantly incorrect percentages being quoted and I have not found the report to be impartially or fairly representative. All the errors and omissions seem to be in the favour of the development despite the many breaches of the BRE guidance with subsequent widespread negative impacts on much of the neighbourhood. 6 Northcote Rd For example, at 6 Northcote Rd, First Floor where we live, the summary table only shows a reduction in VSC of greater than 20% on 1 window rather than for the 3 windows that the data clearly implies - if the calculations had been completed correctly. These 3 windows represent 100% of our most important living space as they are our prime living and working space 16 hours/day in a post Covid working from home environment. As far as we can envisage, we will actually lose almost all sight of the sky from the room and simply be looking from all parts of the room and beyond at a plain brick wall just 21 metres away. This wall will tower several metres above our windows and the skyline on this floor. This brick wall "feature/view" will intrude into and throughout all the key living spaces in our flat even including the kitchen. The data would also appear to indicate that we may lose more than 20% of our Annual Probable Sunlight from especially in the winter months when sunlight is scarce. However, this data is not highlighted in the report. The impact of such developments on our lives and wellbeing would be massively detrimental, especially as one of us is prone to SAD in winter. We don't really understand the NSL calculations so we can't comment usefully except to say that in light of the data and the presentation of what we have seen so far in this report we are deeply concerned and very distrustful. Elsewhere: Across the report we note numerous VSC errors and omissions: Table 10.2 6 Northcote Rd should indicate that 5 out of 17 windows (29.4%) have more than 20% reductions in VSC (failures) rather than 3 out of 17 failures (18%) as reported. Note this equates to a significant 63.3% error in favour of the proposal. 5 Northcote Rd indicates only 1 window out of 11 has more than 20% reductions in VSC (9%) when the data shows 4 failures (36.3%) 4 Northcote Rd indicates 1 out 11 windows (9%) fail when there are actually 3 failures(27.3%) 3 Northcote Rd indicates 4 out of 14 windows fail (28%) when there are actually 7 failures(50%) 2 Northcote Rd indicates 7 out of 15 windows (47%) when there are actually 8 failures(53%) 1 Northcote Rd indicates 8 out of 15 windows (53%) fail when there are actually 10 failures(71%) Pooles House indicates 17 out of 71 windows (24%) fail when there are actually 23 failures(32%) Everything appears to have been significantly (mis)represented in favour of the development - I have

estimated 71 errors and as many of these houses are split into flats the percentage impacts of these losses can be very significant for different households. Annual Probable Sunlight Hours As far as I can see the tables in the appendix are full of N/A's which do not generally show the percentage sunlight reductions nor do they show the calculations for the amount of APSH lost across hundreds of windows Pt. 4.15 states: o Sunlight will be adversely affected if there are 0.8 times former sunlight hours during either period o The reduction in sunlight will over the whole year will be greater than 4% APSH Pt. 10. states: If the overall annual loss is greater than 4% of APSH, the room may appear, colder and less cheerful and pleasant. However, for the data provided for the Northcote Rd residential properties it would appear that over 95% of the windows will get a reduction in APSH greater than 4%. Over 90% of windows will get reductions of over 20% light in the winter months, some from existing low levels of light, especially the lower floor flats. This is a significant adverse impact for very many people which has not been highlighted in the surveyors' report The level of both errors and omissions in this report would appear to significantly undermine the accuracy and validity of the numbers quoted and potentially, the conclusions about the adverse impacts of this development. If the same level of omissions or errors is true across the whole report, across all the properties it appears to massively underplay the impacts of the loss of daylight and sunlight on the direct neighbouring communities to the Zoo's perimeter. The Townscape and Visual Assessment The proposed development is in a wonderful, unique and historic conservation area where the guidance states that: See Planning (Listed Buildings and Conservation Areas) Act 1990, section 72, paragraph (1) 72General duty as respects conservation areas in exercise of planning functions. (1)In the exercise, with respect to any buildings or other land in a conservation area, of any [F1functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. Much has been done within the inevitable constraints of the site itself within the walls to preserve the main beautiful features as far as possible - given the desire to build hundreds of housing units! Unfortunately, this has resulted in the housing being pushed to the perimeter wall. Here, it is clear that in many cases the net effect is the opposite of preserving or enhancing the conservation area within which the Zoo sits. The biggest problem seems to be the sheer scale, length height and form of the structures in such close proximity to the neighbouring residents and streets. While some of the structures might work in some places as small infills in a district, this entire development is on a very different scale. i) There is almost 600 metres of a continuous modern blocks flats which is entirely out of character with the conservation area. The combination of height, continuity and proximity to the wall especially on the narrower streets such as Northcote Rd will overpower and dominate the neighbourhood like nothing else in Clifton. While the properties are claimed to enhance the sense of a "walled garden", the fact they tower 50 - 60 feet above the wall in many places creates more of a sense of a "walled city or fortress". Some have called it Stalinesque. In general, 2-4metre walls with a one or two storey storey structure previously behind them (not always solid but see through) now have 4 or 5 storey buildings proposed - rising up to 60 feet higher than before. ii) The flat roofs do not complement the pitched roofs of the Clifton roofscape but obscure them in places. In some cases, they also bring the tops of the buildings closer to the street and their neighbours creating a more domineering impact. iii) The height and proximity to the streets and other properties obscures the sky, plus key glimpses of mature trees and the historic buildings such as Clifton College which are so much part of the character of this

historic neighbourhood. This is especially true on the South end of Northcote Rd where residents live and work and children study and play and walk to and from classes. It also clearly applies to views from Guthrie Rd. iv) The level of loss of sky and sunlight loss in winter for the hundreds of people who walk along Northcote Rd every day and live or work or play in many of these neighbouring properties will be substantial. It will create even longer darker winters that will surely be to the detriment of the hundreds of people affected, just when we are all at our most vulnerable. It is noticeable that the proposal is very sparse on images at street level. These would give a much better sense of what the potential impact of the proposed development would be. Many pictures are plans, aerial photos or simply, rather flattering sketches. A walk around the perimeter looking up easily shows the difference. Mostly, it is very hard to see how the proposal can be said to be "preserving the character" let alone "enhancing it". Elsewhere in Clifton, where buildings of comparable heights exist they are rarely directly opposite, so close to each other or so close to the pavements or thoroughfares. They are either at least 28 - 35 metres away from each other and set back from the pavements or they have many "look throughs". These elements help sustain and create a sense of spaciousness and sky that characterise the neighbourhood. The report summary Pt. 8.9 clearly states that the development will "increase the effect of urban closure," "provide increased visual closure of the local street views" and "substantial adverse effects" for "private residential properties on Northcote Rd." Apart from the improvements of replacing some low quality buildings at the top of Northcote Rd, the only beneficial effects acknowledged in the report appear to be the few glimpsed views into the site through the proposed new access points. At best, these "positive" effects have been acknowledged as slight. The larger number of adverse effects in the report are either judged as moderate or substantial. The photos 37 -47 in the appendix provided in support of this judgment regarding the level of adverse effects experienced really do not give any accurate sense or feeling of the adverse impacts of this development - which are a lot more powerful than implied. The report suggests the adverse impact for Northcote Rd is moderate. Maybe this is partly because it states that this is a "strongly urban environment". However, despite some urban features especially at the North end this categorisation does not seem so true at the South end where the Victorian terraces and residential buildings are. Photo 42 does show that the lower end of Northcote Rd feels more suburban rather than urban as described in the report. This photo also shows that at least 30% of the mature greenery viewed from this location would be obscured by the proposed development - which is obviously an adverse impact. Clifton is a spacious suburb and the high levels of sky and visibility and mature trees visible throughout. These characteristics help it retain this spacious feeling even when more urban features are occasionally present. The increased height of the buildings and greatly increased sense of closure along Northcote Rd especially at the southern end of Northcote Rd will completely destroy this sense of suburban spaciousness. The report does however acknowledge the severe adverse impact and high sensitivity of the scheme for the residents of Northcote Rd at the South end. This makes it all the more surprising and disappointing that the proposal was not adapted in this respect, especially given the constructive suggestions made by the residents during the consultations for some appropriate height reductions and cut throughs. These were ignored, much to our considerable distress and frustration. Environmental Concerns I am not an environmental expert but how likely is it really that several years of building works and demolition, uprooting over 100 mature trees, introducing 200 new homes, 400 new permanent residents plus 100+ cars is actually going to

	<p>support or enhance the environment? I see the Tree Forum in a public comment has suggested that the Zoo's claim of an improvement in its sustainability is wrong and that there will indeed be a significant deterioration. I do not understand how such a unique 12 acres site, relatively undisturbed/stable for so long with so many mature and unique trees and vegetation habitats can be considered appropriate to redevelop in this way on this scale for so little housing and social benefit</p> <p>Conclusions It is understandable that the trustees of the Zoo and their team of experts may feel they need to put in as strong a plan as possible so that they can maximise the potential profit for the site and so that feel confident that they are not at risk of being sued for not fulfilling their fiduciary duties. However, the scale of this scheme proposed and the apparent disregard of almost all the valid major concerns expressed by the neighbourhood during consultations has been enormously disappointing and distressing. The omission of helpful images at ground level which could have been produced plus the volumes of omissions and errors in data presented need to be rectified and clearly presented and made available for all to see and understand. For a site of this size the detrimental impacts need to be better explained and understood. I believe the Council might consider an independent review or new reports for these items. If this current proposed scheme were approved, I believe the Zoo's legacy would be far from what it desires. While doing very little to address the crisis of affordable housing, the proposal currently risks leaving an embittered darkened neighbourhood permanently diminished in many of its unique and precious qualities, surrounding quite a posh housing estate. The profit from approving the change of usage and this scheme would clearly benefit the zoo and the developers by millions of pounds. However, it would be at the direct expense of Clifton which would suffer years of massive disruption as the site was transformed for such a large project plus longer term enduring negative impacts of something that so clearly fails to preserve and enhance the character of the area in many important respects. Surely, if housing has to be approved, at the very least a much "lower rise" solution is required. This would benefit the internal zoo site residents as well as the entire neighbourhood. Alternatively, could the zoo and the Council give something like the OurWorld proposal a better consideration for a more fitting and suitable legacy for the benefit of the whole of Bristol? If this change of usage and the scale of this residential development were to be allowed by Bristol City Council now, this could be a massive, opportunity lost for this historic unique site, forever. This would appear to be for the sake of a few expensive dwellings benefiting a few hundred mostly quite privileged and affluent people, plus some profit for the property developers and some extra "windfall" millions which are desired but not actually required by the Zoo - which is a charitable trust. All of this would be at the expense of Clifton, its unique and outstandingly beautiful neighbourhood and conservation area and of no significant benefit to the remainder of Bristol. We all understand the reason for the loss of the Zoo which is a very sad loss for the city and the neighbourhood. It has brought much life and vitality and happy memories to so many for over hundred years and will be greatly missed. Surely, we all deserve something more fitting in its memory, than a large, overbearing, "rather posh housing estate".</p>	
--	--	--

249.	<p>Dear Matthew As you are the Case Officer for the above, I am writing to ask for your advice and help regarding a number of matters concerning the Bristol Zoo Planning Application Ref. 22/02737/F and in particular, I have questions regarding the processes likely to be involved from now. I am a resident of 6 Northcote Rd and Chair of the Northcote Rd Residents Association. You will have seen various objections, concerns and fears expressed from different Northcote Rd residents, who are almost certainly the Zoo's residential neighbours potentially most adversely affected by the proposed development. This was acknowledged in the townscape assessment and to us personally, by the Zoo planning team. Our Primary Concerns Our concerns have been primarily based on the potentially overpowering, overbearing, overshadowing and intrusive impacts of the immediately adjacent proposed blocks of flats planned so high and so close to us all. In our particular part of the neighbourhood at the bottom end of Northcote Rd, the incongruence of the design and its scale and potential adverse impacts on the townscape in an historic conservation area plus the significant losses of daylight and sunlight, really are much larger than the planning application and some of its supporting documents imply. There is nowhere in this part of Clifton where such large-scale block of continuous modern housing development exists directly opposite other housing in such close proximity. We have been particularly concerned by the quality, limitations and implications of two documents supplied in the application: 1. The daylight and sunlight survey: acknowledged privately as a "dark art" by Geraint Jones the Savills surveyor, this was full of inaccuracies, with dozens of omissions and seemed utterly misrepresentative of the effects of the development. Some more but not complete detail about the levels of omissions and inaccuracy is contained in my personal, previously submitted objection. 2. The townscape and visual impact assessment: where the suggestion that this was all an urban rather than suburban landscape (only really true for some parts of the wall) and a few select photos in the appendix gave no impression at all of the impacts of the scale of this development in reality as experienced at ground level. For example, appendix photo 45 seems to imply that two mature trees and a significant amount of sky will not be obscured by the 5 storeys intended block, which they surely will be. Indeed, the overall planning application is very light in demonstrating this real ground and street level visual impact - using just a couple of highly selective sketches. This seems surprising for the most major development in Clifton for decades where surely everyone should be getting a much fuller and proper representation of the proposed outcome. Given the huge negative impact of these current planning designs on what I believe you call the "residential and visual amenities" of the residents of Northcote Rd, we are all very worried that decisions are now going to be made based on what we believe to be either inaccurate, substandard, biased or misrepresentative documents. And, although we know that loss of private views and property price losses are of no relevance to planning decisions, for some of us the potential adverse impacts in the current proposal are genuinely heart breaking. If implemented, they would seriously diminish the quality of our lives and our living. This would be true if we stay or if we leave after having incurred the costs of moving and the devaluations of our properties Our Questions We are exceptionally keen to know that the planning process will allow our concerns and our alternative viewpoints and/or documents to be properly considered. This is especially so given the undoubted potential scale of damage to our mental and financial wellbeing from these current plans. However, we freely admit we do not know how best to ensure this can happen. Are you able to advise us please? We have become increasingly worried partly because of what everyone feels has been a "sham tick box neighbourhood consultation" process by</p>	14-Aug-22
------	---	-----------

the Zoo's team and partly because some of the documents commissioned by them seem biased and misrepresentative - perhaps unsurprisingly. In their clear pursuit for maximum profit, the Zoo planning team repeatedly seem to have shown almost complete disregard for the concerns expressed by neighbours on all sides of the Zoo including the West Car Park and Clifton College. If possible, we would like to know the following please: i) What is the process from here on in and where or how do we at Northcote Rd get our concerns properly explored? ii) What happens on the Monday 12th September determination date/what is the process? iii) What is likely to happen or could happen after this date? iv) Is there anything we could do privately in advance that would help/or we could do afterwards? v) Will there be another independent light survey commissioned? vi) Will there be a requirement to model ground level and street views of the development from inside and outside the zoo? Will they be independent? If so, who will pay for them? vii) Would it make sense for the neighbours to commission some of these services and if so, by when would they now be needed? Could we be given access to some of the Zoo's team data/models already built to help do this? viii) Would it be helpful to submit some more illustrative pictures and corrected photographs of the visual impact at ground and street level even if not terribly sophisticated? Would it be helpful to submit these with some constructive suggestions? ix) Would it be possible for you or a representative of the Planning Committee to meet briefly with us and literally see things from our points of view? And if so, when? (A late afternoon as the sun drops is quite illuminating!) In our experience, once people have seen the current heights of the proposed development in relation to the existing trees and buildings on Northcote Rd a short 5 minutes' walk is sufficient to reasonably visualise how (shockingly) overbearing the impact would be. This is all due to the combination of the proposed building heights and their proximity to the street. It is immediately obvious that huge amounts of sky and practically all glimpses of mature trees and of the historic buildings, plus almost all the late afternoon sunshine will be obliterated. It is these characteristics that give this part of the neighbourhood its character and keep it feeling suburban and spacious, despite some low-level urban features being present. Once these features or characteristics are lost, the Northcote Rd area becomes much more urban, more enclosed and quite a lot darker for much of the afternoon and early evening. Some of these elements were slightly acknowledged but in a very understated way in the townscape assessment.. In our personal instance at 6 Northcote Rd, the proposed outlook changes from looking at broad skies and trees stretching almost a mile away to simply looking at a 50ft -60 ft high brick wall just 66 feet away, with barely a glimpse of sky from any window - intruding and dominating all our key living and working spaces. To visualise this potential change is truly shocking and deeply dispiriting. It is a genuinely distressing experience I now have many times each day, every day since the planning application was submitted - after the last consultation we were all shocked by the absence of any fundamental changes. I would really welcome an opportunity for you to visit us so that you can so simply and easily visualise all this. The adverse impact here at this end of Northcote Rd is evidently many times worse and much more instantly visible than that of the West Car Park. Yet, if there were a meaningful conversation with the neighbours we feel these particular concerns might be reasonably addressed with some reductions in heights and scale or increases in distance in the right places. The Northcote Rd residents are not inherently opposed to plans for housing. However, we have become very upset by the Zoo's approach which has come across as feigning interest, feigning sincerity and feigning concern. They have proposed a scheme with almost complete disregard for



	<p>our clearly expressed key concerns and constructive suggestions and which is directly and very evidently at the significant expense of our own mental and financial wellbeing. The current application clearly seeks to maximise their profit with complete disregard and at huge direct emotional and financial costs to their direct neighbours. (They can only get an extra million pounds because we, collectively, lose a million pounds so to speak!). While we appreciate both the Zoo's needs for money and Bristol's needs for housing it is surely not the responsibility of the Council to maximise the profits for the Zoo, to the clear disadvantage of the existing neighbouring community. The legacy the Zoo's team are proposing to leave Clifton after 186 years does not currently appear to be either an inspiring or a happy one for its erstwhile neighbours. We are now very much hoping and relying on the Planning Committee to help address this matter fairly - obviously, with full regard to planning law and planning guidelines. We understand there are many stakeholders and demands including present housing needs and Zoo trustees to be taken into account. As the Northcote Rd residents who are directly adjacent, we have been acknowledged as the most adversely affected of the residential neighbours. We simply cannot see how the current plans for our neighbourhood can reasonably be argued to preserve and enhance the neighbourhood's character. More detailed examination and understanding of the significant reductions in daylight and sunlight plus the obliteration of almost all views of historic buildings and trees from within the terrace and at street level show the development would significantly damage the neighbourhood's character for us all and massively diminish the quality of very many more lives at our end of the development than it will ever enhance. We would like to be reassured we will be given a proper and fair chance of proper representation regarding our expressed concerns and we would very much like to understand how best we might achieve it. Any advice you can give will be greatly appreciated. Please do forgive the length of this letter. I know things are slow in August but given the pending September 12th determination date I would greatly appreciate your prompt acknowledgment of your receipt of this and welcome your response and advice as soon as possible, please. Many thanks and best regards</p>	
250.	<p>Please think about the potential for harm that development of this site will cause - the major objection I would raise relates to the buildings proposed - the sense of scale is overbearing. The monolithic appearance is completely detrimental to an area of such stunning historic architecture, and whilst I am a fan of combining old with new architecture, this is not sympathetic or appropriate - the Zoo site holds significant heritage value for Bristol - the huge loss of Communal Value to the people of this city and further loss of valuable, precious green urban space and public amenity is permanently diminished - the harm to listed buildings, that however sympathetically they are converted, they will no longer be accessed by the public and will have their community purpose lost and their use permanently altered. - has the Zoo's justification for abandoning the site been proven? or are they using the pandemic lull as a for a revamped plan to one single site (that was gifted to them) and opportunistically cashing in? - please don't overlook the fact that it is listed as a local Historic Park &amp; Garden and an Important Open Space - with grave concern that half the trees will go and many more may be damaged. This site is so special, make a decision that enables it to stay that way. Change is inevitable, but it should be better change, for the good of the wider Bristol and regional society it serves - spaces like this are too precious.</p>	17-Aug-22

251.	<p>With the confirmed departure of the Bristol Zoological Society ('the Society') in Clifton, there is need to consider change of use of the zoo site as it holds such significance both in terms of heritage and its position in a conservation area, adjacent to Clifton College School and a range of significant historical buildings. This is the largest building scheme in Clifton for many decades (perhaps ever), and must be very carefully planned and orchestrated. This application saddens me as it appears the line between need and greed has become blurred. The Society will not be the ones commissioning or managing the build, and all safeguards must be thought through by planning, ahead of any proposal being passed. - loss of light or privacy - the scale of the proposal will overlook Northcote Road properties (in particular) and limit their light, and privacy. At most, any buildings on that perimeter should not stand taller than those existing buildings in Northcote Road - overshadowing - the adjacent Northcote and College Roads are very narrow, with resident parking bays or double lines - roads that the height and overscaled apartment blocks along the perimeter walls would dominate at a scale disproportionate to all adjacent conservation area buildings - highway safety - there is no detail about a street lighting plan, nor how this will impact the locality. The plan denotes seven new entrances, four of which will allow vehicular access, which will impact the surrounding streets which are already crowded with school vehicles at any time of day (mini buses, maintenance vehicles, delivery vehicles and full size coaches) plus parents at drop off and pick up times in numerous cars. - traffic and parking issues - whilst the Society have been making efforts to explain their proposal through production of printed materials distributed through letterboxes in the neighbourhood, the literature is misleading, as it fails to illustrate any cars (bar one parked under an awning), but depicts children playing and families picnic-ing, ambling or in a learning space. The gardens look lovely, but the reality is this is a housing development for 201 homes. Cars will need to access the suggested 120 spaces provided in 'undercroft' or 'covered parking' but this is not denoted in any illustrations, giving a false representation of the planned 'other-worldliness' atmosphere. Guthrie Road and the surrounding streets encompass the 'hub' of the Clifton College school campus. The existing traffic for school drop off and pick up times is already unmanageable, despite efforts by the school to encourage the 'if you care, park elsewhere' mantra and are unable to restrain parking on yellow lines, yellow zigzags, and road corners. The proposal suggests an increase in pedestrians in the area, who will be in jeopardy with the subsequent congestion generated by a housing scheme of this scale. The Society propose that residents of the site will be less likely to need a car, but on what grounds do they know that? The lack of parking spaces will create spill out into surrounding roads directly or indirectly - perhaps through visitors to the 'free' gardens - amenity - the concept of amenity suggests that a building project would be considered attractive and agreeable, adding pleasantness to a surrounding area. The design to date illustrates overdevelopment of six storey structures which will dominate surrounding homes and detract light, limit privacy and possibly present safeguarding issues for the adjacent school buildings and play areas - wildlife - 44 trees to be relocated in a limited landscape? Where is the plan for these trees? Trees are not just what is illustrated on the surface by trunk, branches and foliage - they have established and interlinked root systems - whilst on the surface it looks like the trees are accounted for, and the significant ones will be left in place, what about their roots? There is little detail, if any, about the affect the installation of utilities, drainage and water management which all require deep digging and excavation will have significant impact on the roots. The gloss of the leaflet sounds reassuring, but the tree report from the tree</p>	17-Aug-22
------	---	-----------

	<p>experts shows more concern that must be factored into this decision. - historic buildings - this is the most significant project of scale in Clifton ever to be proposed, and must be in keeping with the architectural assets of the locality. The scale and design of the proposal jars with neighbouring historic buildings - conservation - the Society holds conservation amongst it's key objectives, but this proposal does not fully integrate the context of building conservation for all the elements, only in the existing buildings e.g. Clifton Pavilion and the Giraffe House - design - the standout flaw of this application is the scale of overdevelopment around the perimeter - appearance of the development - the glossy illustrations are misleading for many people who will take a leaflet at face value and believe the Society will deliver the application on based on those illustrations. The reality, sadly, is more likely to be that the Society will be long gone, having sold the site and secured the funding needed for the Wild Place Project site. As members of the proposed Management Board of the 'gardens' they will have no influence or say on the build project I object to this planning application, and hope that one evolves that is of better scale and is more fitting in local scale and conservation interpretation. As the Society's brochure says 'it is important we leave a legacy we can be proud of in this beautiful part of the Clifton and Hotwells Conservation Area'. Well then, do just that, not this.</p>	
252.	<p>As a major conservation zoo in the UK and one which has undergone major capital development across the last decade including complex planning applications we welcome and fully support the plans for Bristol Zoo Gardens. It is clear that the society have thought long and hard about the application to not only provide housing in a popular and beautiful area of Bristol but to ensure the legacy of Bristol Zoo Gardens remains and providing an inclusive space for residents and visitors to enjoy. Retaining such an important site to the people of Bristol and Clifton is of huge importance and the team at the zoo have put this front and centre in their thinking from day one. As chairman of the British and Irish Association of Zoos and Aquariums and CEO of Chester Zoo, I applaud the careful consideration the zoo team have taken in the project and would recommend it for approval.</p>	18-Aug-22

253.	<p>The BZG planning committee have made very detailed and considered changes to the original development proposal. It remains a much needed source of new housing in Bristol whilst preserving the heritage of the zoo site. It will add very well designed new housing to a very constrained housing stock in Bristol. I remain shocked at how selfish very affluent local residents and parents/members of an elite private school can be in carpet bagging this planning portal with objections to this extremely reasonable proposal. If this was so important to keep things as is these same people should have actually found a way to financially support the zoo to keep the site. Appeals were made and met with deaf ears at that time hence the BZG site being proposed. As it is, the BZG team are taking a very considered approach to the design which is above and beyond what a standard private developer should do: the site is being made accessible to the public and for free (this was not the case before when the zoo was open); they are providing a mix of housing for more affluent residents whilst also providing a significant percentage of affordable homes; there is real preservation of garden and iconic parts of zoo architecture. With the amended application the BZG has made amendments to reduce some multi-family housing due to the aforementioned objections. I personally do not think these changes were needed, but they did make them thus demonstrating the BZGs real commitment to acknowledging and responding to criticism as reasonably possible. In terms of the overall site, I remain fully supportive - we desperately need more homes in Bristol, and especially need more homes in central areas of Bristol. To really fight climate change at a council level we should be improving density so people can walk/cycle instead of commute to workplaces. Building densely supports business by increasing their market too. Building more homes helps increase the supply of housing and helps gradually deal with the homeless situation. These are not disputed facts. I hope the bad faith objections of NIMBYs in Clifton do not overwhelm reason when it comes to this application. Also it is worth emphasising, people in Bristol who own very expensive homes have a personal financial interest in keeping the housing stock limited at this end of the market - it inflates the value of their homes accordingly. Many of the objections appear to be obfuscating their true intent. Frankly if a detailed, well considered application like this does not meet an acceptable standard, what would? Inaction will lead to an empty undeveloped site, or some parking - that is not a good use of space. (I am not even acknowledging the what can only politely described as 'eccentric' proposal to build a VR zoo in a massive hangar building that has been astroturfed as a supposedly reasonable alternative). Finally, this whole process highlights the unfair nature of the state of planning permission in the UK. Who comments on these applications, and whose voices are unheard? Do comments on this application reflect the sentiment for the wider community? Do random comments from pressure groups reflect democracy or justice? I hope when the council considers these objections or comments in support of the application these questions are also considered carefully. I hope my comment does not appear intemperate but as a millennial medical doctor in the NHS and also researcher at the University I have struggled with the housing market in Bristol, and despite my profession being relatively well paid. I think the council should work for everyone rather than those sections of society who happened to buy housing 20-30 years ago when the average mortgage was 3-5 times an average yearly salary as opposed to the 10-20x it stands now.</p>	31-Aug-22
------	--	-----------

254.	<p>I remain supportive of this development. The housing proposals are simply beautiful and give the public access to a lovely garden for free. I do not sympathise or empathise with the reflexively negative commenters objecting to this proposal. As far as I can tell these people would only be happy if nothing ever changed, if no new people ever moved into Bristol, and they could maintain a static city. I implore the council to ignore the objections from people who are simply resistant to any change - they will never be pleased by any proposal. If it were up to them their own houses would never have been built in the first place as they would have objected to any building without a thatched roof. Modern buildings with timber frame construction are brilliant, long lived, and have a much lower environmental footprint. They allow for modern energy efficiency standards to be met and they can be built quickly. Bristol is a growing and vibrant city. Trying to block people being able to get new homes here is simply an injustice and is leading to increasing problems of housing insecurity in the aggregate. Consigning people who want new homes to only buying in the suburbs on brownfield sites is not fair and also not going to allow the city to meet climate targets. We need more density to promote alternative transport modes such as cycling, walking (not to mention fee paying customers to support more bus routes) which lessens the climate impact of people who would otherwise be spread further and more inclined to drive. Bristol Council should be embracing this fortunate position it finds itself in as a popular city for people to move by enabling more housing development at density. In time this will significantly support plans for e.g. a Bristol metro by providing the customers that will use it. I also think the arguments re "not enough affordable housing" should be ignored - the site needs to be commercially viable to support the new Zoo site, and also 20% of ~150 homes is a lot of new affordable housing that would not be available if this site is not built. International data from cities in New Zealand and Canada has demonstrated the clear correlation of easing housing development through e.g. permitting reform/planning rules promoting density, and reducing the rate of house price growth. This should not have to be explained but if you increase supply to meet demand, price falls. People understand this with daily purchases but seem to think housing is a special case. Notably in Harlem, New York City, USA recently a housing development of a large apartment block was opposed through similar arguments of "insufficient affordable housing" - the site is now being continued to use for its current purpose, a truck (lorry) stop. These objections are what I class as bad faith objections. Often such objections are made simply to prevent any new building and are not truly concerned with provision of affordable housing. Finally, I feel this site should not have any barriers to increasing density or implementing the full vision of its design. The architect has designed a truly beautiful site and it would be a shame to allow these NIMBYs who seem to be organising an undemocratic astroturf campaign against the development to win with their regressive arguments. These objectors just want to maintain their property values at the expense of the rest. The losers of such an outcome are the people of Bristol.</p>	31-Aug-22
------	--	-----------

255.	<p>It is not surprising a new housing development on a much loved zoo site attracts strong feelings. Notably when it came to finding means to support the zoo to stay open at this site with funding from this same public, that did not materialise. Bristol needs new housing. This is a large area of land being redeveloped with careful consideration to provide this very much unmet need. It is heartening to see a mixture of new housing including the provision of some affordable housing as well. The objections from the nearby private school and parents of pupils from this school strike me as incredibly unjustified and unfair. We should not be giving undue weight to the already very privileged to pull the ladder up from others in society (in this cases through maintaining the status quo of insufficient housing stock in Bristol). Finally, the following is not likely to be a popular opinion, and overall I remain supportive of this application, however I think more rather than less housing should be planned and provided. I do not think it is particularly good land use or equitable for the wider community that large tracts of this development are dedicated to public space. It would be better for this to be used instead to site more housing but I also understand that often people like having areas of green space next to them. It is worth considering that the zoo site is right next to the very large green space of the downs however.</p>	31-Aug-22
256.	<p>As a local resident I am concerned about the effect of the residential development of the Zoo Site. Clifton as a whole is already running low on space for existing households. In particular the issue of parking for cars. 201 extra households will invariably mean a significant increase in the number of cars. Either 201 parking spaces (an undesirable idea) will need to be provided or residents will end up parking their cars in surrounding streets which are already very full. The aesthetic of the area also must be considered. There are several examples of unsympathetic development throughout the Conservation Area already. It is of course impractical to demolish them. The Zoo site should not become another of these unsympathetic developments. The aesthetic of the area is integral to what makes Clifton a unique part of Bristol. The style of many of the proposed buildings do not fit the style of other residential properties in the area. I am also concerned that some of the building are too tall. Many of the buildings in the surrounding area are harmonious in height. The number of stories ought to be reconsidered to fit in better with the surrounding buildings. As I understand it Clifton College have pointed out their own concerns with the development. The majority of the surrounding area is in fact boarding houses and school buildings. Not that you would really know as the College buildings on the whole blend in almost seamlessly with the residential area. If the College is able to provide boarding facilities for its many students without impacting the aesthetic of the area, why should Bristol Zoological Society not be held to the same standard? As mentioned the surrounding area has many young students living and studying 24/7 almost year round. The plans for redevelopment of the site seem unconcerned about the welfare and safety of these students. Proposed buildings overlooking school buildings and play areas is an undeniable safeguarding concern. The increased traffic in the area caused by the redevelopment is likely to increase the already present risk of traffic accidents involving students. In summary I feel that the redevelopment of the Zoo site ought to be a heavily community focused project. The residential plans ought to be scaled back significantly and also radically redesigned to better suit the surround area. The redevelopment of such a historically important site should not be seen as a financial opportunity but a</p>	04-Sep-22

	<p>preservation project. BZS should be looking to leave the Clifton site on a high note after so many years of being a treasured part of the Clifton Community. If these plans go ahead they will instead be causing lasting damage to a community that supported them. Preserve the integrity of the local area and the history of the site.</p>	
--	---	--

257.	<p>The Bristol Zoo site has been a marvellous resource for the residents of the whole of Bristol and a wide surrounding area for a very long time. I believe it should be preserved and maintained as a Botanical Garden which it has been up until now. The surrounding prison-like walls should be demolished - they are no longer needed to protect citizens from ferocious wild animals. The area can be opened up for free access on a permanent basis for Bristol residents at least. It is very likely that residents in the surrounding areas would be willing to contribute by subscription to maintain this as a free service for everyone. The model in my mind is that of the very old and spectacular Botanical Gardens in Durban, South Africa. I do not think that present plans will lead to this site being freely open to the public for very long because those who have paid considerable sums for the larger accommodations will inevitably want to exclude the public after some time and I do not know how effective any safeguards would be to prevent this. Affordable housing is a praiseworthy concept which I would support. In fact, it would be better to set aside an area on the periphery of the site for modest but well designed affordable housing only, perhaps available to key workers for rent (otherwise modest purchased houses would be passed on at immodest prices after a while). This might require the financial and administrative input of Bristol City Council and I don't know how they would regard this. The present building plans are, as usual, completely out of character for this part of Bristol. The buildings are too tall and too monolithic. Whatever else is decided, far prettier buildings are needed to fit in with local character. The ground floor parking under the proposed new buildings is inexpressibly ugly and inappropriate in these times. Vehicle parking should only be available to staff maintaining the gardens. There has never been parking on the zoo site and it should not start now. There is a very good adjacent public bus service. Like the Cribbs Causeway development which is not in Bristol, the new Wild Place Project zoo site is outside Bristol and no benefits, financial or reputational, accrue to Bristol. Let us at least make a new and spectacular Botanical Garden a credit to Bristol.</p>	05-Sep-22
------	---	-----------



258.	<p>The Bristol Zoo site has been a marvellous resource for the residents of the whole of Bristol and a wide surrounding area for a very long time. I believe it should be preserved and maintained as a Botanical Garden which it has been up until now. The surrounding prison-like walls should be demolished - they are no longer needed to protect citizens from ferocious wild animals. The area can be opened up for free access on a permanent basis for Bristol residents at least. It is very likely that residents in the surrounding areas would be willing to contribute by subscription to maintain this as a free service for everyone, and I certainly would. The model in my mind is that of the very old and spectacular Botanical Gardens in Durban, South Africa. I do not think that present plans will lead to this site being freely open to the public for very long because those who have paid considerable sums for the larger accommodations will inevitably want to exclude the public after some time and I doubt the efficacy of any safeguards to prevent this. Affordable housing is a praiseworthy concept which I would support. In fact, it would be better to set aside an area on the periphery of the site for modest but well designed affordable housing only, perhaps available to key workers for rent (otherwise modest purchased houses would be passed on at immodest prices after a while). The present building plans are, as usual, completely out of character for the heritage of historic Bristol. The buildings are too tall and too monolithic. Whatever else is decided, far prettier buildings are needed to fit in with local character. The ground floor parking under the proposed new buildings is inexpressibly ugly and inappropriate in these times. Vehicle parking should only be available to staff maintaining the gardens. There has never been parking on the zoo site and it should not start now. There is a very good adjacent public bus service. Like the Cribbs Causeway development which is not in Bristol, the new Wild Place Project zoo site is outside Bristol and no benefits, financial or reputational, accrue to Bristol. Let us at least make a new and spectacular Botanical Garden a credit to Bristol.</p>	05-Sep-22
------	--	-----------

259.	<p>Comments: I would like to raise three further objections to those already raised:</p> <p><b>Economic Benefits</b> The comment from the Council's Economic Development team - to the effect that "the Economic Benefits Assessment document represents a reasonable estimate of the potential economic benefits of the proposal" - cannot be taken seriously. The document is not balanced and does not follow - as the report claims - HM Treasury Green Book Guidance for reasons I have set out in my previous objection.</p> <p><b>Carbon Factors</b> The Council's Sustainable City team have commented: "As SAP 2012 carbon factors were in use for Part L 2013 at the time of the initial submission, the use of these carbon factors has been continued for the revised statement (rather than Part L 2021). For the purpose of BCS14 calculations we consider this to be acceptable" The same applicant was recently awarded consent on the West car Park site. That application (21/01999/F) was submitted long before this application (22/02737/F). In a September 2022 revision to the Energy and Sustainability Statement accompanying the application 21/01999/F, the applicant's consultants, Hydrock, updated the carbon factors used in the calculation of the residual CO2 savings from the proposal from Pat L 2013 to Part L 2021. the comment from the Sustainable Cities team seems to indicate that the Council would find it acceptable under the newer application to make use of the older carbon factors. The Council's position should be considered in the light of the rather obvious point that it cannot be for the applicant to pick and choose the carbon factors which suit its purpose of seeking to demonstrate compliance with extant policy, still less, for the Council to consent to the wishes of the applicant when it is clear that the basis for the calculation has changed. To put this another way, the Council is sanctioning an approach to the calculation of carbon savings from renewable electricity generation which have not been reflected in the carbon intensity of generation for more than ten years. It is obviously out of date. It is incredibly disappointing to see a Council that has declared a climate emergency seeking to ease the path of an application based on endorsing the use of carbon factors that are completely divorced from prevailing reality. This view is unacceptable and must be changed.</p> <p><b>Affordable Housing</b> As regards affordable housing, the Applicant's Planning Statement (from Savills, October 2022) states: "Application Policy BCS17 state that affordable housing will be required in residential developments of 15 or more dwellings. A minimum of 40% provision is sought in Inner West Bristol, subject to viability, although the Affordable Housing Practice Note (April 2018) allows a 20% provision subject to meeting the required criteria. The tenure, size and type of affordable units will reflect identified needs, site suitability and economic viability". Currently, the Council is likely to exceed targets it set for building new homes, but will fail to meet its target for affordable homes. The approach in the Affordable Housing Practice Note (AHPN) seemed inconsistent with a sincere attempt to deliver the required number of affordable homes. The AHPN does not form part of the statutory development plan. New policies cannot be set out in the Affordable Homes Practice Note, so the Core Strategy policies would remain the locally relevant ones. BCS17 in the Core Strategy states: Affordable housing will be required in residential developments of 15 dwellings or more. The following percentage targets will be sought through negotiation: - 40% in North West, Inner West and Inner East Bristol; - 30% in all other locations It would be extremely difficult, in the circumstances, to argue that 20% affordable homes is the outcome that would have resulted under the extant policy BCS17. If that is not the case, then it would be reasonable to argue that the AHPN had materially influenced the policy in ways that it cannot do. There is a general understanding (it is a matter of public record) that the applicant seeks to sell the land to generate revenue in support of its objectives.</p>	25-Oct-22
------	---	-----------

	<p>It is not the role of the Council's planning function, or the development control committee, to facilitate the achievement of a higher value for land than might otherwise be the case. In the context, therefore, and recognizing that there is likely to be sufficient residual value in the land value to justify a higher proportion of affordable homes, then if consent were given to the proposal, it would be difficult to argue that the AHPN had not given rise to a material change in the application of the extant policy on affordable homes, BCS17. The 20% affordable homes offered by the applicant a) is inadequate, and b) has been arrived at in a manner that is inconsistent with the application of BCS17.</p>	
--	--	--

260.	<p>The Planning Statement from Savills makes much of the context in which the application is made, in particular, the situation that Bristol, Clifton &amp; West of England Zoological Society (BCWEZS) finds itself in. It also makes much of the economic impacts, as well as the supposedly sustainable nature of the proposal. Background The economic plight of the Zoological Gardens site is significantly of BCWEZS's own making. The publicly available Annual Report and Financial Statements for BCWEZS, made up for the year ending December 2019, reported on the 2020-2025 Strategic Plan. Included in the Plan were: - "Capital investment at both Bristol Zoo gardens and Wild Place Project"; and - "...a clear long-term vision and masterplans for both Bristol Zoo Gardens and Wild Place Project. Bristol Zoo Gardens transformed by the time of its bicentenary in 2036. Wild Place will continue to grow into an even greater wildlife adventure, while Bristol Zoo gardens will place a greater value on visitors' interactions with and understanding of individual animals. The Report and Financial Statements in the same document then reported that the closure of both sites as a result of the coronavirus pandemic was impacting on this strategy. It noted: Following the Coronavirus pandemic and the financial implications arising from the closure of both sites from 21 March to 19 June 2020 for Wild Place Project and 14 July for Bristol Zoo gardens, the Trustees will be reconsidering this strategy and the Society's ability to raise the capital needed to implement the planned major capital development projects. .... It will take time for the longer term implications for the Society to be more fully understood and the impact on its future longer term strategy. This will be the main objective for 2020 alongside the continued focus on ensuring both sites operate safely for our employees, visitors and animals and the implementation of cost saving initiatives. Note the wording here - reconsideration of the strategy was supposedly to follow, and not precede, the pandemic. The reported financial performance for the year was not at all suggestive of impending financial meltdown, though alarm bells were being sounded, as would have been prudent in the circumstances. The Report contains a Report of the Trustees, which was approved by the Board of Trustees, and signed off by its Chair on 24 September 2020. The accounts were signed off by the accountants on the 6th of October by the auditor acting on behalf of BCWEZS. Nonetheless, around two months after the Trustees Report report was signed off, at the end of November 2020, the Zoo reported that it was closing the Clifton site altogether, relocating to the Wild Place Project site in South Gloucestershire. Bristol Post reported: The new Bristol Zoo will offer spacious, modern facilities, significant growth in conservation and education work and a ground-breaking, innovative visitor experience, said a Bristol Zoological Society spokesperson. [...] The plans have been announced after the second lockdown forced Bristol Zoo Gardens and Wild Place Project to close, after months of closure during the peak spring and summer months. Although BCWEZS has been keen to draw links between the closure of the Clifton site and the pandemic, there is more than a suggestion that this has provided a somewhat convenient way for BCWEZS to give a decision that had been considered for some time a softer landing. This is because the visitor numbers at the Zoo site in recent years appear to have been negatively affected by the growth in visitor numbers at Wild Place Project, which BCWEZS also owns. Although what was written in the Annual Report and Financial Statements for the year ending end of 2019 gave no clear hint of this, as the Planning Statement for the West Car Park notes: A formal submission for pre-application request was made to Bristol City Council in March 2020. The proposed development submitted for pre-application comment related to a scheme for 78 dwellings (no affordable housing provision and a proposed density of 153 dph) and the buildings proposed ranged from 2-4.5 storey</p>	25-Oct-22
------	--	-----------

plus semi basement parking. It is clear, therefore, that well before the Report and Financial Statements for year ending 2019 were signed off, and in advance of the first lock-down linked to the Covid-19 pandemic, BCWEZS was exploring the option of developing the West Car Park. It is not entirely clear, therefore, that plans were not already afoot to sell the Clifton site well before the effects of the pandemic became known. Chris Booy, Vice Chair of Trustees, in his written statement regarding the Zoo's application on the West Car Park, noted: In late 2020, Trustees of Bristol Zoological Society voted unanimously to relocate Bristol Zoo to the Wild Place Project site. [...] This decision followed an extensive process to explore a number of options, as well as taking independent professional advice. It seems clear that preparatory work to inform the decision had been underway for some time. It is a little surprising that the Trustees Report remained silent regarding the preparatory work ongoing, including the pre-application submission to Bristol City Council. The Charity Commission's Guidance on preparing a trustees' annual report indicates: If your charity's income is more than £500,000 you also need to: - explain your strategy for meeting its charitable purposes - list any significant activities you undertook as part of this strategy - give details of what your charity achieved in carrying out these activities to meet its purposes The omission, in the Report, of any mention of the pre-application submission, or other work underway at the time, is an omission in the Trustees' explanation of their Strategy. In a video purporting to explain its decision, the CEO, Justin Morris, reports that there has been a 'significant decline over many years' in visitor numbers. The evolution in visitor numbers at the Clifton site has, between 2008 and 2019 (we have excepted the 2020 year for fairly obvious reasons) exhibited a downward trend overall. This is true for both total visitor numbers and paying visitors. The former exhibits a compound rate of decline of less than 1% per annum, the latter, a slightly higher compound rate of 1.4% (see Figure 1). Figure 1: Evolution of Visitor Numbers over Time, 2008-2019, Zoo Gardens Site Source: all data are from previous versions of the BCWEZS Annual Report and Financial Statements Neither of these rates seems 'precipitous', though equally, that they were happening would have been risen to consider additional forms of income generation and / or a change in the nature of the visitor experience, as mentioned in the Report and Financial Statements. The picture is rather different, though, if one looks only at the period before the Wild Place Project was up and running. In the period from 2008-2013 (2014 was the first full year where WPP was in operation), there is no obvious downward trend in visitor numbers at all (see Figure 2). There is no clear increase either (there is, possibly, for the paying visitors). Figure 2: Evolution of Visitor Numbers over Time, 2008-2013, Zoo Gardens Site Source: all data are from previous versions of the BCWEZS Annual Report and Financial Statements The main period of decline in visitor numbers at the Clifton site coincides with the opening of WPP, and the increasing number of visitors choosing to visit there over time. This must have been foreseeable: a competing (even if run by the same entity) attraction of a similar nature to an existing one would be expected to draw some visitors away from the existing attraction. Indeed, as WPP visitors have steadily increased, it might be considered somewhat surprising that visitor numbers at the Clifton site held up as well as they did (see Figure 3). Figure 3: Evolution of Visitor Numbers over Time, 2008-2019, Zoo Gardens Site and WPP Source: all data are from previous versions of the BCWEZS Annual Report and Financial Statements If BCWEZS wanted to maintain visitors at the Clifton site, establishing a competing attraction was a strange way of seeking to achieve that. Since 2013, total visitor numbers at the Zoo site have held up rather better than the number of paying visitors at the Clifton site: whilst the former have

	<p>declined by 1.3%p.a. in the period up to, and including, 2019, the latter have fallen by 2.6% p.a. over the same period. In Chris Booy's statement referenced above, he noted that the decision was linked to operating losses in recent years, coinciding with the opening of WPP: The decision to relocate after 185 years of memories was not taken lightly, but after making an operating loss in four of the last six years, we had to move forward to safeguard the future of the Society. It might be considered, therefore, that decisions of the Zoological Society's own making have been at least partially responsible for its worsening financial performance. There was also a statement made to the effect that the relocation to WPP would enable 'millions more people to enjoy the magic'. The 2035 vision for the zoo sets out a target regarding visitors. By 2035, the aim is to: 'Engage and connect with more than 800,000 visitors and members per annum.' In 2019, across the Clifton site and WPP, there were 830,000 visitors (see Figure 3), or more than the target for WPP to achieve by 2035. The implication is that by 2035, the main effect of a strategy that achieves the 800,000 targets will have been a net transfer of the half a million or so visitors at the Clifton site to WPP. The potential environmental consequences of each scenario are explored below. The suggestion that the new zoo site will have, in the words of the Chair of the Trustees, Charlotte Moar, 'conservation and sustainability at its heart' is questionable. Indeed, BCWEZS's strategy looks like the antithesis of what an entity concerned with wildlife would do, recognizing that - as BCWEZS well knows - one of the major threats (if not the major threat) to species extinction comes from climate change (see below). Although this preamble may seem of limited relevance, it does need to be recognized that Development Management Policy DM31 (see further below) requires that: Where a proposal would affect the significance of a heritage asset, including a locally listed heritage asset, or its wider historic setting, the applicant will be expected to: i. Demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; Given that BCWEZS's decision have been responsible for the drop off in visitor numbers at the Clifton site, then it might have been expected to take 'all reasonable efforts' to sustain the existing use (including, presumably, by closing WPP, or by rationalizing the use of each site according to suitability for key species). The application has not demonstrated that this has been done. Economic Benefits If applicants make claims for their proposal that are obviously unfounded, it is important that these are highlighted. The report by Savills - 'Economic Benefits Assessment' - is blatantly lopsided as an exercise in economic assessment, whilst also being riddled with errors and judgements of a questionable nature. Officers and Councillors are at risk of being seriously misled by this report. The report claims that: The assessment of economic benefits follows guidance from the Homes and Communities Agency Additionality Guide (HCA, 2014) and HM Treasury's Green Book (2020). This report does not, though, follow the HM Treasury's Green Book: if it can be said to have done so, it does so selectively and in a uniquely biased manner. The Treasury's Green Book would have required external costs and benefits to have been included in any assessment. These are genuinely public costs and benefits and might have a central role in determining whether the harm to heritage assets is justified. Because no attempt has been made to identify any external costs (because the assessment fails to respect the guidance it claims to have followed), it could not reliably be determined whether the harm to heritage assets was justified. Without a proper appraisal of these matters, attaching monetary values as per the HM Treasury Green Book Guidance (including Supplementary Guidance), the Council cannot possibly determine whether the harm to heritage assets is justified. Nonetheless, we should</p>	
--	---	--

	<p>explore the claims made further. The assessment suggests the reference case for the assessment is as follows: The reference case for this assessment is the site in a vacant state once the Bristol Zoo moves to its new home. We can compare this with the words in the Addendum to the Transport Statement from Peter Evans Partnership related to the same application: Bristol Zoo Gardens closed to members of the public in September 2022, after the submission of the planning application. However the zoo use remains the permitted use for the site. Therefore consideration of this use and the associated traffic generation in the baseline position as set out in the Transport Statement for the scheme remains appropriate. The Planning Statement sets out a range of benefits which are attributed to the application. 5.75. What is abundantly clear is that, while the nature of the movements may be different as the site moves from being a tourist attraction to a residential/community use, overall there will be a significant reduction in movements associated with the proposals (DM23 states that development should not give rise to unacceptable traffic conditions). 5.76. It is also relevant to note that it is understood that in excess of 85.5% of visitors to the zoo currently travel by private motor car, while the application proposals not only seek to reduce total movements, but also to encourage alternative modes of transport. [...] 5.82. Residents will not be eligible for residents parking permits and so, in comparison with the existing tourist use where there would be significant use of the pay and display on-street parking, it is anticipated that there will be a significant reduction in parking demand on surrounding streets. It is clear from the above that all the transport impacts are assessed against a baseline of the Zoo operating as an open visitor attraction, whilst the economic assessment assumes a baseline where the site is vacant. If the site was to be treated as an operating visitor attraction for the purposes of assessing transport impacts, why would the economic assessment take a completely different baseline as the basis for the assessment? It doesn't really matter which one believes is more relevant - given the site is, de facto, not open for business, then it seems difficult to sustain the fiction that it is still occupied. Either the claimed transport benefits are not as they are, or the claimed economic benefits are not as they are. The applicant is guilty of choosing multiple different baselines to suit whatever case it is seeking to make in a given document. A clear view is required on how assessment should proceed. Is it the Transport Statement or the Economic Assessment which is wrong? The approach to appraising the impact of the proposal is clearly not consistent across the application. Claimed Additional Homes The social and economic benefits of the site include a suggestion that the 196 additional homes are to be included as a social and economic benefit. There are relevant questions to be considered as to whether these homes are genuinely 'additional'. The Planning Statement is clear enough on the need for new dwellings due to a 'shortfall': BCC published its Five Year Housing Land Supply Assessment 2020 to 2025 in June 2021, which confirms that the Council cannot demonstrate a five year supply of deliverable housing sites. It confirms that the council only has a 3.7 years supply of housing land. The statement also confirmed that BCC is failing to deliver sufficient homes against the Housing Delivery Test, at 72% of the delivery requirement. The administrative area of Bristol is, therefore, in need of significant new residential dwellings to address the shortfall The claim that the homes which are proposed will be additional raises questions regarding the counterfactual. If there is a shortfall against existing policy requirements, then it become more difficult to argue the 'additionality' case. Can it be argued that these houses are additional to what would otherwise be supplied when a) there is a shortfall against targets, and b) where growth in construction activity is limited by a shortage in</p>	
--	---	--

	<p>availability of labour? If the homes were not developed here, the shortfall might, after all, equally be met elsewhere, though ultimately, the pace of delivery of dwellings may be constrained by the availability of suitably skilled labour.</p> <p>Employment Claims In respect of employment, the Assessment claims: The proposed development would generate more jobs, economic activity and revenues to the local government than the reference case which is the vacant site once the Bristol Zoo moves to its new home. The economic benefits include 125 on and off-site construction jobs during the 3-year construction period for residents of Bristol; 54 on-site jobs during operation (including people working from their home)</p> <p>Proposals such as this will not generate new 'jobs' in construction. The employment market across the UK is currently tight, and it is especially tight in construction. The Construction Skills Network suggests that there will be an additional quarter of a million workers required between now and 2026 (it is not entirely clear where they are expected to come from). The likely impact of this proposal is to contribute to overall construction activity, the pace of delivery of which may be constrained by the availability of sufficient workers with the relevant skills. The net effect of the proposal is likely to be, at the margin, to slow down the pace of delivery of everything else. The figures for the on-site jobs are even less defensible than those for the construction sector. The Assessment states: Once operational, the proposed development could generate up to 54 on-site full time equivalent (FTE) jobs upon completion based on the employment densities for each use class within the proposed development, including 41 homeworkers.<sup>5</sup> The estimate for the numbers of homeworkers who will reside on-site is based on the ONS estimates of homeworkers as a percentage of working age residents in the South West<sup>6</sup> and applying that on the household level. What this is identifying is - based on ONS estimates - how many of the residents at the site might be home workers. In order for it to be correct to claim the site might 'generate' these homeworking jobs, it would also have to generate the people. These are people who do not spontaneously emerge once the site is built: they do already exist. Nor does the development spontaneously create (anywhere) opportunities for homeworkers at the site. To attribute these jobs to the site is not credible. There may be some employment attributable to the development in terms of staff at the café, office and community hub, but one also needs to consider the relevant counterfactual. There might be some additional spend (relative to what would have occurred anyway) but much (not all) of it is likely to be 'displacement' of spend that would have occurred elsewhere. All this assumes that the appropriate counterfactual is a vacant site - if one took the view adopted in the Transport Assessment - that the baseline is a still functioning Zoo, then even on the methodologically flawed grounds that the employment claims are made, the change at the site would look very different. In summary, the claimed employment generation is unsound. New Expenditure</p> <p>Similar comments can be made regarding 'new expenditure' by residents. The assessment makes the following assumptions: To estimate the additional expenditure from new residents, we take the average household expenditure for convenience goods, comparison goods and food and beverages as detailed in Table 2.6. We multiply the expenditure by the respective retention rates to estimate how much of this expenditure is retained in Bristol City's retail and restaurant units. We then multiply the result by the 196 additional households in the proposed development. This calculation gives an estimate of the weekly residential expenditure which is then multiplied by 52 to estimate the yearly expenditure. We estimate that the expenditure that would be retained in the local authority area to be approximately £1.5m per annum. The residents will not be 'new people' (other</p>	
--	--	--



than any new-born children). They already exist somewhere, and they spend money. Correctly considered, the expenditure is likely to imply displacement of expenditure that would have occurred elsewhere (unless the occupants already live nearby, in which case, their expenditure patterns may be similar). It would be difficult to justify, however, attributing any additionality to this spend. Some incremental uplift might be attributable to the café simply because of its proximity to residents. This assumes, of course, that the appropriate counterfactual is a vacant site - if one took the view adopted in the Transport Assessment - that the baseline is a still functioning Zoo, then even on the methodologically flawed grounds that the 'spend' claims are made, the change at the site would look very different. The Assessment goes even further than this: 2.5.3. This additional expenditure is expected to support additional jobs in retail and food and beverage. Using average turnover per employee in these sectors we estimate that this will support 13 jobs for residents of Bristol, which are accounted for in the multiplier effect outlined in Table 2.5 above. 2.5.4. Additionally, expenditure from new residents living at the Proposed Development would support employment in local shops and businesses in Bristol City. Again, it is very difficult to justify a view that the jobs supported would be 'additional'. The point at para 2.5.4. seems to be double counting the effect described in 2.5.3., which itself is not genuinely additional. GVA The Gross Value Added (GVA) calculations are effectively run off the employment assumptions discussed above: Gross Value Added (GVA) is an indicator of wealth creation by measuring economic activity associated with the operations in the development proposal. This section outlines the estimated GVA benefits which would be generated compared to the reference case. We have based our estimates based on GVA generated per worker in the South West region<sup>7</sup> and the number of operational jobs created by each use type presented in Table 2.3. The proposed development scheme is estimated to generate £1.6m per annum. Given the questionable basis for the employment figures claimed in the report, then it follows that the claimed GVA figures are also unsound. There are other reasons, though, why the GVA figures are unlikely to be attributable to this site. This may seem counter-intuitive, but it comes back to the question of the relevant counterfactual: if this scheme were not given the go-ahead, would the same level of GVA be generated from construction across the year? If the labour market were not so constrained, then it might be possible to claim the GVA as 'additional', especially in conditions where the consenting process for housing was such that rates of build were in excess of what was required by Government (there was clear scope to argue that the development was 'additional', in the sense of being above levels required by Government policy). Neither is true in this case. Construction-related GVA will not be affected by what in the UK context is a relatively small scheme. Tax Revenues as Economic Benefits The Savills Assessment goes on to describe how the proposals could lead to the generation of additional public sector revenue. It is rather odd to see taxes and other transfers included as 'economic benefits'. Council Tax revenue is not 'an economic benefit': it arises as a transfer of income from private households to the Council. The same is true of Business Rates, except that the entity paying is a business, transferring funds to (at least for the majority of them) Bristol City Council. The payment of CIL is also a transfer. The New Homes Bonus is a transfer of funds from central government to local government. Where do Savills imagine the New Homes Bonus payments come from? Does the revenue materialize from thin air? HM Treasury's Green Book notes: 6.7 Transfers of resources between people (e.g. gifts, taxes, grants, subsidies or social security payments) should be excluded from the overall estimate of Net Present Social Value

(NPSV). Transfers pass purchasing power from one person to another and do not involve the consumption of resources. Transfers benefit the recipient and are a cost to the donor and therefore do not make society as a whole better or worse off. Only under quite specific circumstances should taxes be included as a benefit. The Assessment makes no such case. It presents all forms of what are, for the most part, forms of charge or tax as 'economic benefits'. Understanding the economic consequences of these transfers would require additional analysis of, for example, the deadweight loss implied by the imposition of the relevant taxes / charges. In reality, the extraordinarily marginal nature of these in the macroeconomic context is such that they would not tend to have any meaningful impact on the framework of taxation and spending that government would implement as a means to achieve its overarching fiscal objectives. Summary There is little in the Assessment of Economic Benefits that stands up to close scrutiny. The Assessment is lopsided in the extreme. It fails to follow Green Book principles in that none of the externalities associated with building out the proposal are considered. There may also be affects on asset values for neighbours that the assessment overlooks. These would not be public disbenefits, but private ones. Nonetheless, they are a reflection of the affect of the site on the amenity of the existing property owners. Transport First of all, it seems clear that - as per the above - the baseline for the Transport Assessment is no longer the relevant one. It is not clear what the BCWEZS would do in the absence of the application being granted consent but given that there appears to be no 'Plan B', then it would be strange to assume that the baseline for the assessment is a state of affairs which no longer prevails. The attempt, in the Addendum to the Transport Statement, to reassert that the appropriate baseline for the assessment is 'the zoo use' because this 'remains the permitted use for the site' belongs in the realms of magic realism. If BCWEZS has based its strategy on a presumption that one or other, or both, planning consents would be granted (irrespective of the nature of the application made), then to the reasons for presuming such an outcome deserve scrutiny, especially if they effectively imply a fettering of the discretion of officers and Councillors to arrive at a rational decision, achieved in a lawful manner. Nonetheless, the claims in the original assessment that, for example, the design of the scheme reflects an assessment that 'in this location it would not be necessary to own a car' and that the scheme provides 'infrastructure and promotion measures ... to encourage non private car travel' cannot be taken seriously: there are 118 car parking spaces proposed. As regards collectively owned vehicles, the Transport Statement notes: 'A car club space and car is proposed as part of the scheme.' That is suggestive of a scheme that does only the bare minimum. The supposed benefits of this car club space are overblown: Whilst provision of a car club vehicle still enables car travel the availability of this vehicle would reduce the need for residents to own their own private car, which in turn is a sustainable benefit to the scheme. This is also a benefit to the wider Clifton area as would enable local residents to use the shared vehicle instead of owning their own car. The aim for this vehicle to be electric brings environmental benefits. In other words, it's not even guaranteed to have the car as electric. The Planning Statement from Savills notes: 5.75. What is abundantly clear is that, while the nature of the movements may be different as the site moves from being a tourist attraction to a residential/community use, overall there will be a significant reduction in movements associated with the proposals (DM23 states that development should not give rise to unacceptable traffic conditions). 5.76. It is also relevant to note that it is understood that in excess of 85.5% of visitors to the zoo currently travel by private motor car, while the application proposals not only seek to reduce total movements, but also to

	<p>encourage alternative modes of transport. [...] 5.82. Residents will not be eligible for residents parking permits and so, in comparison with the existing tourist use where there would be significant use of the pay and display on-street parking, it is anticipated that there will be a significant reduction in parking demand on surrounding streets. One could be forgiven for thinking that the two consultants' reports are discussing a completely different scheme, other than in the respect that they both assume - erroneously - that the effect of the proposal on traffic should be considered as if the Zoo was still open. The applicants may pretend all they wish that the Zoo hasn't closed, but it already has, and that decision was of the applicant's own making. The appropriate baseline for this assessment is a non-functioning Zoo, with no visitors, and no visitor traffic, not a state of affairs that has now passed, and for which there are - apparently - no clear plans to return to. But why, if the location is so 'sustainable' (what does it even mean for 'a location' to be 'sustainable?'), were 'in excess of 85.5% of visitors' to the Zoo, when it was still open, travelling by car? Why does the Transport Assessment assume that the behaviour of the would-be residents will be so different in the face of similar travel options? The reality is that the Transport Statement does not really envisage car-free travel, and is not expecting much by way of this in future. Indeed, notwithstanding the 118 car parking spaces, the Transport Assessment is happy to consider the potential for this number being exceeded. It includes a thoroughly unconvincing plan for what it appears to anticipate will be pressure for additional car parking: However BCC confirmed early in the pre-application process that residents of the BZG site would not be able to apply for on-street parking permits. This removes the potential impact of overspill parking from occurring on a daily basis, as pay and display parking locally is time limited. Therefore when residents move into the site they would be aware of whether they have space to park a vehicle or not. The level of car parking proposed is therefore designed on this basis. MfS [Manual for Streets] identifies at section 8 that lower car parking provision can be successful when adequate on-street parking controls are present, which is the case at the BZG site. Ineligibility for on-street parking permits would be made clear through any sales and marketing agent. With allocated car parking proposed this provides residents with a clear understanding as to whether their property is car free or not. The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. The presumption is that there would be controls feeding into habits, but as the above extracts indicate, parking restrictions locally are time-limited. Those using cars for travel into work would, therefore, compete for spaces outside the hours of time-restricted parking. Since the Statement mainly considers impacts relative to 'peak time' traffic, it is unclear whether the Statement has properly considered the possibility that would-be residents may simply take a chance on out-of-restricted hours spaces being available. Contrary to what is stated, therefore, it seems likely that there could be intense competition for local parking spaces in the hours outside the restrictions - the exact same hours when visitors to the Zoo would not have been seeking to park their vehicles. All o</p>	
261.		25-Oct-22

262.	<p>I find it difficult to believe that this application is considered to be complete given the lack of evidence on, notably, the environment / energy side. I have made these views known to relevant officers, but in the absence of a response to most recent questions, I note the following: The absence of an integration of a commitment to reduce embodied carbon in the design (both in terms of materials and the completely inappropriate scale) is not aligned with National planning Policy Framework, notably para 134 and the associated Guidelines. It is inconsistent with even the existing Net Zero Strategy, and not in line with stated policy in this respect. The Council has the ability through existing policies, notably BCS13, BCS14 and BCS15, to reflect the requirements of the NPPF in respect of design quality in its decisions. Given that the design fails in respect of embodied carbon / energy, then it should be refused. In respect of other matters, the 'Economic Benefits' assessment is completely lopsided. It claims to follow guidance on additionality from the now abolished HCA, making highly subjective decisions regarding the magnitude of these benefits. It also claims to follow guidance on appraisal from the Treasury Green Book. If it does so at all, it does so only in the most impartial and lopsided manner. No professional economist ought to render such a document on the basis that it captures the economic benefits. It is of concern that the comment from 'economic development' simply asks for further elaboration of these benefits without highlighting any of the very obvious deficiencies and shortcomings of the presentation. Whether or not the document concerned should carry any weight at all in a development control decision is moot, in any case, yet since the Committee and officers have tended to reference these in decision making, possibly considering this (rightly or wrongly) as part of the balance they must weigh up, then it seems entirely appropriate to indicate that the benefits assessment is, literally, Cyclopic in its outlook, focusing only on 'positive' benefits without weighing up - as per Treasury Green Book - the wider impacts of the development. These include, but are not limited to, environmental impacts, none of which have been considered in the assessment of benefits. In the expectation of further information and revision, these comments are not as detailed as they will be on receipt of a revised proposal.</p>	25-Oct-22
------	---	-----------

263.	<p>There is much to be welcomed in this proposal, and it is clear that the provision of a public open space and the construction of additional housing is an appropriate use for this much-valued site. However, having read through the documentation I am left with two major concerns: The first centres on the quality of the design of the proposed residential buildings and their scale. The impression I get from the plans is that three of the four sides of the site will be dominated by monolithic slab-sided blocks that tower over the surrounding buildings, rather than enhancing them, and do not fit in with the character of the conservation area. Why is it not possible to design buildings that are sympathetic to those around them, and why is it necessary to seek to build five/six-storey blocks when those in the rest of the area do not rise above three storeys? I urge planners not to accept second-rate design and not to allow over-development, and accordingly to reject the current designs and insist on lower buildings. The second arises from the issue of public access. I applaud the proposals with regard to the open space in the centre of the development. However, I believe that there are insufficient safeguards to guarantee public access in perpetuity and that there is inadequate financial provision for ensuring that the gardens are properly maintained in the long term. Any permission granted must be contingent on an appropriate sum of money being set aside to provide for the maintenance of the site and for a suitably robust management structure being put in place to oversee its maintenance.</p>	01-Nov-22
264.	<p>Whilst being broadly in favour of this site being used for a mixture of private/social housing and public access and welcoming many of the proposals for the open areas, I continue to be concerned about two aspects that these revised proposals fail to address: I remain of the opinion that the design of the flats surrounding the site is not in keeping with neighbouring properties in the conservation area and that they are too tall to fit in comfortably. No attempt has been made to design them to harmonise with local building styles and it is imperative that such an important and sensitive site should benefit from more sympathetic and appropriate new construction. The proposals for managing the open areas still fail to provide adequate safeguards for ensuring public access in perpetuity. The proposed funding model means that residents will have a strong incentive for restricting access - this could be mitigated by establishing a trust fund at the outset for maintenance of the grounds using funding provided as a condition of granting planning permission. Without adequate funding the gardens and buildings will soon deteriorate.</p>	01-Nov-22

265.	<p>Hello planning department, I've just gone through the visuals of the planned build of our former zoo. I'm incredibly disappointed at the proposed development and hope you see the sense of reviewing what has been laid out. I pity the poor local neighbours who will be overshadowed by the far to high proposed buildings as well as this development bringing nothing in keeping to this area, we're not far off of it looking like a soviet block built prison. There are far to many house/flats/etc in these proposed plans and to me the whole development really stinks of commercial greed (which I guess is nothing new in what we've all witnessed these past years) by developers. Why can't this be a low level green development with more affordable units and more of the existing park space available to all to enjoy? The visuals show nothing to engage in the conservation area that the zoo sits in. You haven't addressed the massive increase in vehicles (from number of proposed dwellings, I'd predict an extra 300+ vehicles) in this area further clogging the narrow roads that surround the zoo and given local residents a further headache in being able to park 'near' their residence. When will we learn that instead of potentially destroying a local beauty spot (yes it could be changed into a walled garden or virtual zoo) we line the pockets of the developers who really don't give a damn about what they do as long as a profit is made. We live in very sad times and I hope you see sense to reject the proposed plans and plan better in keeping with this historic area and have a development that is environmentally less damaging. Yours in hope, Bill Brown.</p>	01-Nov-22
266.	<p>Having read the proposals I cannot agree to the scale of the development. I do appreciate that the Zoo requires a goodly sum for their site but the proposal by the developer maximises every aspect of the site and the surrounding streetscapes. The canyon-like streets that are created by the development are totally unacceptable and totally against the cocept of the Conservation area that was set up to guard Clifton against developments like this. I am totally opposed to this proposal.</p>	03-Nov-22
267.	<p>Having just seen some modelled visuals of the Zoo's proposed housing development, to say I am shocked would be an understatement. The flats are ugly concrete blocks, at least two stories too tall, which totally dominate the surrounding streets and existing houses. Not only do they have no architectural subtlety or interest in themselves, but there has been no attempt at blending in with the surrounding Victorian buildings. It's bad enough that the Zoo has gone, but to put in its place such hideous constructions is an insult to the local residents, and indeed the whole City of Bristol. The Zoo was something that made me proud to be a Bristolian, but this proposed development is an embarrassment. For a City that prides itself on its creative talent and heritage, it shows no innovation or intelligence in design and quite how anyone could even propose such a scheme in the first place is beyond my understanding. If planning permission is granted it will be an incredible missed opportunity to create something beautiful for the future on a site of such historic importance, and will be yet another example of Bristol City Council getting things so very wrong.</p>	03-Nov-22

268.	Very ugly and not in keeping with the beauty of Clifton and the Downs.	04-Nov-22
269.	I am a local parent and have frequented the zoo often. I use and love the area. The redevelopment is ugly and uncalled for. It brings More people more traffic. More pollution. It is obscenely too high, aesthetic pollution. It excludes the public from a space that was meant for the public. We should treasure our historic sites, buildings and open spaces not just see them as profiteering opportunities by offices, shops and dwellings on them. There are so many ugly office, industrial sites to redevelop. Just because it is in Clifton the profit margins for developers, owners and council must be huge. Quality of life is important. I object this redevopment.	04-Nov-22
270.	The height of the proposed structures is far too high. There are just too many flats squashed in. It will look very ugly. As must be obvious to all, this proposal has nothing to do with protecting the heritage of the site. It is all to do with maximising revenues.	05-Nov-22
271.	The plans, especially the housing stock proposed, are not in keeping with the street scene and the conservation area. The housing is too high and as such will both obscure light and affect trees. The area has already suffered from traffic pollution and additional cars parked or coming into the housing will place a heavier burden on the area in terms of traffic crowding and pollution. The roads around the site are small and mainly reduced to single flow traffic which can already be prone to bottle necks. The area is already becoming overpopulated due to many local residences in BS8 being converted in to HMOs for students . The site has a long history of being a public amenity as a gardens and should continue as a public amenity, or at the very least be primarily a public amenity with some low rise housing on the place of existing buildings.	05-Nov-22

## Second consultation phase

7<sup>th</sup> November 2022 – 15<sup>th</sup> January 2023

STANCE	COMMENTS	DATE RECEIVED
272. S	All the new properties should have covered balconies. Surely we learnt that during the pandemic, and makes them feel so much more airy, accessible, environmental (plants), communal and practical. Could envisage buying one of the new properties, as this is potentially a lovely development, but only if with a balcony (or terrace if ground floor).	07-Nov-22
273. S	just make all the apartments with a covered balcony/terrace - so much better for enjoyment of the outdoors	07-Nov-22
274. S	support it if they all have covered balconies, would make it lovely.	07-Nov-22
275. S	buildings could be more attractive - more glass, more balconies	07-Nov-22
276. S	Looks like a fabulous idea. However I would propose 2 things: Firstly that almost all the properties have a covered balcony - so much nicer to live in and environmentally sound - covered to provide an outside space even in inclement weather. Secondly - consider stone/brickwork as used in the Redland Girls School development (Bath stone?) Which looks lovely and in keeping with the area. Some indication of likely prices of resulting properties would be interesting please.	07-Nov-22
277. O	My original objections are unchanged by the revised proposals. The proposed development is in a Conservation Area The design of the houses is totally out of keeping with the Victorian houses in the neighbourhood and indeed most of Clifton. What's more they are high, much higher than most of the perimeter of the existing site so will stand out very prominently. I don't object to new houses being built but it is a Conservation Area and therefore the design should be in keeping with the surroundings and the heritage of Clifton.	07-Nov-22
278. O	Through the enormous mass of documents revising the plans, I couldn't see anything addressing the awful external nature of the proposed development. The proposals are still totally out of keeping with the visual appearance of the local area and would be a blot on the landscape. Any development must fit in with the rich architectural character of this part of Clifton - the proposals have total disregard for the fact this is a Conservation Area.	07-Nov-22
279. O	Received a letter from the Zoo and the pictures on the first page showing a park area all look great. I looked at the next page and see 6 story buildings are being proposed. 6 stories is far too high and out of keeping with the general nature of Clifton. Any new build should be no higher than the typical Victorian properties in Clifton and designed in a style far closer to the other Victorian buildings in the area - not modern high rise blocks of flats. These are visually out of character with Clifton.	07-Nov-22



280. S	<p>The BZG planning committee have made very detailed and considered changes to the original development proposal. It remains a much needed source of new housing in Bristol whilst preserving the heritage of the zoo site. It will add very well designed new housing to a very constrained housing stock in Bristol. I remain shocked at how selfish very affluent local residents and parents/members of an elite private school can be in carpet bagging this planning portal with objections to this extremely reasonable proposal. If this was so important to keep things as is these same people should have actually found a way to financially support the zoo to keep the site. Appeals were made and met with deaf ears at that time hence the BZG site being proposed. As it is, the BZG team are taking a very considered approach to the design which is above and beyond what a standard private developer should do: the site is being made accessible to the public and for free (this was not the case before when the zoo was open); they are providing a mix of housing for more affluent residents whilst also providing a significant percentage of affordable homes; there is real preservation of garden and iconic parts of zoo architecture. With the amended application the BZG has made amendments to reduce some multi-family housing due to the aforementioned objections. I personally do not think these changes were needed, but they did make them thus demonstrating the BZGs real commitment to acknowledging and responding to criticism as reasonably possible. In terms of the overall site, I remain fully supportive - we desperately need more homes in Bristol, and especially need more homes in central areas of Bristol. To really fight climate change at a council level we should be improving density so people can walk/cycle instead of commute to workplaces. Building densely supports business by increasing their market too. Building more homes helps increase the supply of housing and helps gradually deal with the homeless situation. These are not disputed facts. I hope the bad faith objections of NIMBYs in Clifton do not overwhelm reason when it comes to this application. Also it is worth emphasising, people in Bristol who own very expensive homes have a personal financial interest in keeping the housing stock limited at this end of the market - it inflates the value of their homes accordingly. Many of the objections appear to be obfuscating their true intent. Frankly if a detailed, well considered application like this does not meet an acceptable standard, what would? Inaction will lead to an empty undeveloped site, or some parking - that is not a good use of space. (I am not even acknowledging the what can only politely described as 'eccentric' proposal to build a VR zoo in a massive hangar building that has been astroturfed as a supposedly reasonable alternative). Finally, this whole process highlights the unfair nature of the state of planning permission in the UK. Who comments on these applications, and whose voices are unheard? Do comments on this application reflect the sentiment for the wider community? Do random comments from pressure groups reflect democracy or justice? I hope when the council considers these objections or comments in support of the application these questions are also considered carefully. I hope my comment does not appear intemperate but as a millennial medical doctor in the NHS and also researcher at the University I have struggled with the housing market in Bristol, and despite my profession being relatively well paid. I think the council should work for everyone rather than those sections of society who happened to buy housing 20-30 years ago when the average mortgage was 3-5 times an average yearly salary as opposed to the 10-20x it stands now.</p>	07-Nov-22
--------	--	-----------

281. S	<p>I remain supportive of this development. The housing proposals are simply beautiful and give the public access to a lovely garden for free. I do not sympathise or empathise with the reflexively negative commenters objecting to this proposal. As far as I can tell these people would only be happy if nothing ever changed, if no new people ever moved into Bristol, and they could maintain a static city. I implore the council to ignore the objections from people who are simply resistant to any change - they will never be pleased by any proposal. If it were up to them their own houses would never have been built in the first place as they would have objected to any building without a thatched roof. Modern buildings with timber frame construction are brilliant, long lived, and have a much lower environmental footprint. They allow for modern energy efficiency standards to be met and they can be built quickly. Bristol is a growing and vibrant city. Trying to block people being able to get new homes here is simply an injustice and is leading to increasing problems of housing insecurity in the aggregate. Consigning people who want new homes to only buying in the suburbs on brownfield sites is not fair and also not going to allow the city to meet climate targets. We need more density to promote alternative transport modes such as cycling, walking (not to mention fee paying customers to support more bus routes) which lessens the climate impact of people who would otherwise be spread further and more inclined to drive. Bristol Council should be embracing this fortunate position it finds itself in as a popular city for people to move by enabling more housing development at density. In time this will significantly support plans for e.g. a Bristol metro by providing the customers that will use it. I also think the arguments re "not enough affordable housing" should be ignored - the site needs to be commercially viable to support the new Zoo site, and also 20% of ~150 homes is a lot of new affordable housing that would not be available if this site is not built. International data from cities in New Zealand and Canada has demonstrated the clear correlation of easing housing development through e.g. permitting reform/planning rules promoting density, and reducing the rate of house price growth. This should not have to be explained but if you increase supply to meet demand, price falls. People understand this with daily purchases but seem to think housing is a special case. Notably in Harlem, New York City, USA recently a housing development of a large apartment block was opposed through similar arguments of "insufficient affordable housing" - the site is now being continued to use for its current purpose, a truck (lorry) stop. These objections are what I class as bad faith objections. Often such objections are made simply to prevent any new building and are not truly concerned with provision of affordable housing. Finally, I feel this site should not have any barriers to increasing density or implementing the full vision of its design. The architect has designed a truly beautiful site and it would be a shame to allow these NIMBYs who seem to be organising an undemocratic astroturf campaign against the development to win with their regressive arguments. These objectors just want to maintain their property values at the expense of the rest. The losers of such an outcome are the people of Bristol.</p>	07-Nov-22
--------	--	-----------

282.	S	It is not surprising a new housing development on a much loved zoo site attracts strong feelings. Notably when it came to finding means to support the zoo to stay open at this site with funding from this same public, that did not materialise. Bristol needs new housing. This is a large area of land being redeveloped with careful consideration to provide this very much unmet need. It is heartening to see a mixture of new housing including the provision of some affordable housing as well. The objections from the nearby private school and parents of pupils from this school strike me as incredibly unjustified and unfair. We should not be giving undue weight to the already very privileged to pull the ladder up from others in society (in this cases through maintaining the status quo of insufficient housing stock in Bristol). Finally, the following is not likely to be a popular opinion, and overall I remain supportive of this application, however I think more rather than less housing should be planned and provided. I do not think it is particularly good land use or equitable for the wider community that large tracts of this development are dedicated to public space. It would be better for this to be used instead to site more housing but I also understand that often people like having areas of green space next to them. It is worth considering that the zoo site is right next to the very large green space of the downs however.	07-Nov-22
283.	O	I have lived in Bristol all my life and Bristol zoo has a big significant's in my life it is a major land mark for Bristol. I remember Alfred the gorilla. The elephants Christine and one other that children could ride on. Polar bears and many other magnificent creatures, I think if we need to move the zoo to build houses on is very sad when there is many areas in and around Bristol we could build houses on. I also understand the new zoo the wild place is impressive but we need to save are zoo in Clifton not just for now but for Bristol Heritage. And for many generations to come.	07-Nov-22
284.	O	I really cannot quite believe what I see regarding the proposals for the zoo site . Completely overbearing,out of character, inappropriate buildings proposed , how dare there be such a over development of the site where once stood low bearing and old buildings were . No doubt large mature trees will be taken down . No , that must NOT happen .	07-Nov-22
285.	O	I strongly object to the proposed development of Bristol Zoo gardens; the proposed buildings,size and architecture would be completely out of character and completely spoil the experience and appearance of the historic buildings adjacent and in the area. Clifton is a suburb of great importance both for residents and Bristol dwellers and tourists who come for the beauty and open nature of the area, this would be a great own goal and well as an act of desecration.	07-Nov-22
286.	O	I object strongly to these plans for housing that have been submitted regarding the site at the Zoo.	07-Nov-22
287.	O	I wish to object strongly to the proposed Plan to change the Zoo Gardens into a housing development. This area comprises many special trees and is a wonderful green area for everyone to enjoy in the future. The area is a national treasure and should be secured for the future. Yours faithfully Sonya Clifton	07-Nov-22

288. O	The site of such a cherished zoo needs to be honoured with special care and consideration, not turned into yet another generic housing development with no identity. The proposed development is too close to the school, it will overcrowd the local homes and there won't be enough parking. We need to use the land in a respectful way that preserves green space, protects ecosystems and wildlife and pays homage to Bristol Zoo.	07-Nov-22
289. O	It is a terrible shame that the zoo had to close but it appears there wasn't enough money or interest to keep it going. The historic site should be made into a park and community/ education site for the people of Bristol to enjoy. Businesses can provide food entertainment and other sorts and leisure facilities so the council receives rate payment and the city becomes a bigger attraction. It will do nothing for the long term benefit of the city to build more flats and houses which will no doubt hand a large amount of cash into the bank accounts of a few developers. Save the zoo site for the people of Bristol	07-Nov-22
290. O	I think the city of Bristol should decide what the best use of this iconic, historic and quasi-public site could be for the benefit of everyone and not just maximising the Zoo's profit margin. For example, Bristol Zoo carrying on but in a modified form, a 'Bristol Kew Gardens', Our World Bristol's proposal for an augmented reality zoo or another type of visitor attraction. The Zoo's planning proposal is advocating for the loss of at least a third of the trees across the gardens. The Zoo's own website describes their gardens as "one of the UK's most important collections of plants" and "170 years of nurture and gardening artistry." The iconic herbaceous border pictured above will be bulldozed and become someone's multi-million pound home. How can the Zoo - a conservation charity dedicated to fighting climate change - justify destroying any of these gardens - against the backdrop of Bristol being a Green Capital and the current climate crisis? Only a fraction of the site will be available to the public. The Zoo offers no guarantee that the gardens will stay open to the public in the long term. There are many other solutions and options that the Zoo could explore and pursue if they would listen and engage. If it was proposed that London, Dublin or Berlin Zoo were to be sold off for private housing there would no doubt be significant public outrage. Bristol is not a capital city but the principal remains the same. The Zoo's desire to bankroll their new attraction in South Gloucestershire is a completely separate issue from the sale and future use of this site.	08-Nov-22
291. O	Bristol claims to be a green city yet is willing to destroy one of the most diverse gardens it has. Removing nearly 46.5% of the current unique trees that the historic Bristol zoo contains. Why not convert this area into a Bristol Kew Gardens equivalent? Let's drive more tourism rather than creating more exclusive tower blocks that will damage the environment. Let's keep the zoo's history and maintain it as exciting place for people to visit across the generations.	08-Nov-22

292. O	<p>The objections raised so far are mostly not just NIMBY neighbours. Most people do not object in principle to the development of the zoo gardens to provide housing. Many of the local residents are not living in multimillion pound properties, but flats and apartments in sensitively converted older buildings, and some ( mostly compatible) modern multi occupancy buildings. It is in the interest of all people in Bristol , not just those fortunate enough to live in Clifton, to maintain an attractive environment, with open green space and well designed buildings. This development raises concerns about the density of residence, and the height of the residential buildings proposed. This is particularly an issue in Northcote Road and Guthrie Road. Three stories would be preferable to 5 and 6, and more compatible with the surrounding environment. The buildings along Clifton Down are more acceptable, as they will be set back behind the existing mature trees. We need to have a more spacious environment, less dwellings packed in to a small area, and less high rise dominating the development. As other commentators have stated, there must be a secure way of sustaining the gardens for public access with a high standard of maintenance guaranteed for the future.</p>	08-Nov-22
293. O	<p>The zoo has been very effective in public consultation and discussion at their series of meetings, and some of the suggestions and ideas expressed by local people have been taken into consideration. Overall the plan has shown some sensitivity to effects on the Clifton environment and the presentation of enhanced gardens with free public access is to be commended. I regret the fact that once again the zoo and Bristol City have decided to crowd as much accommodation into this space as possible, greatly increasing the density of population in this restricted area. The buildings, while having some sensitivity in design , are again taller than are suitable for this site. Four stories would create much less visual impact than the planned six.</p>	08-Nov-22
294. O	<p>I have previously commented on the plans to redevelop Bristol Zoo for residential purposes and whilst I was broadly supportive to these proposals, I was very disappointed with the unpleasant visual aspects of the proposed design. As a long-standing local resident is a matter of great concern that the unsightly eyesore which constitutes this design has not been significantly modified in the latest proposals. Indeed, it is hard to discern what changes have been made and good design cannot be replaced by the meaningless spin set out in the Design Guide. Therefore, I must continue to express my disgust at the unsympathetic nature of these proposals which are wholly out of keeping with the surrounding historic area. I must also emphasis that successful design does not stop at the site boundary but must produce a development which fits into the local environment comfortably. The current proposals fail on these grounds and so should not be allowed to proceed unmodified. Moreover, permitting this ill-fitting development to proceed, will set an unhealthy precedent for the future and could easily lead to a rash of similarity ill-conceived development proposals in the Clifton district which will destroy the ambience of the local area. Hence, the applicant should think again and devise something more keeping with the situation of the site.</p>	08-Nov-22

295. O	<p>I am disappointed to note that the latest proposal are very little changed from their predecessors meaning that the chance to create a feature which enhances the locale is being lost. It is difficult to see why the promotors are continuing to believe that grey is a sensible colour for such a prominent development as it more suited to bunkers, machine-gun nests, multi-storey car parks, gasworks and other such utilitarian structures. Indeed, its hard to believe that anyone who has spent any time at all in Bristol has noticed that it rains a fair bit and so the use of warmer colours is highly desirable. In short the local residents are the people who will have to live with this development and their opinion on its appearance deserves to take precedence over imported architects. Regards Paul Johnson</p>	08-Nov-22
296. O	<p>Whilst I consider that it is a shame that Bristol Zoo feels it must move from its historic and easily accessible site in Clifton to a much more remote and unsustainable location adjacent the M4 motorway as this seems rather contrary to its ecological and conservation objectives, I broadly welcome these proposals. This is because I believe that a carefully designed residential development is the best alternative use of this site. I also consider that it is laudable that the applicants seek to maximise the number of dwellings present and at the same time preserve its gardens. Likewise, I welcome the potential to reduce fly-parking arising from the removal of the Zoo. Nevertheless, I have many concerns about these proposals as they stand. My primary concern is that the buildings are too tall and will overshadow the adjoining properties and dominate this part of Bristol. Thus even a casual visit to the area in which the Zoo is situated will indicate that with the exception of the prominent landmarks provided by several church towers, the Cathedral Spire and the tower of Clifton College, the buildings surrounding this site are of a relatively uniform 3 or 4 storey height. This is true not only of the immediately adjacent area, but of most of the Clifton and Clifton Down areas. As this is not true of the current proposals and I fear the that will visually dominate this area unacceptably. I consider this to be particular problem in respect of Clifton College where it seems that the range of historic buildings adjacent to Guthrie Road will dominated by the new buildings and this will ruin the College's setting by creating an unwelcome intrusion into its backdrop from the south. Whilst placing the taller buildings on the northern site of the site where the ground rises would seem to be sensible, those on the other sides must not be allowed to overshadow the existing buildings on Guthrie, Northcote and College Roads. The current proposals fail in this respect. Likewise, a casual visit to the area in which the Zoo site is located will indicate that most of the building are constructed in the warm colours provided by red sandstone and creamy limestone walls. However, the current proposals seem to be finished in a rather drab cold colour more befitting of a 1970s multi-storey municipal car park than this location and they will do little to enhance its appearance. I notice that the brochure I have receive makes a play of the fact that this development will sit 'sympathetically within the walled gardens' already on the site. To be successful this development must also be sympathetic to the area outside this wall and in this respect, I consider that it fails dramatically. So more need to be done to harmonise this development with its wider surroundings and not just eth former zoo site itself. Consequently, whilst I would not wish to see a pastiche of the surrounding Victorian architecture, I feel a design more in keeping with its neighbourhood in terms of height and colouration could readily be devised. Hence, I feel it rather smacks of something</p>	08-Nov-22

		<p>being parachuted in from outside with little thought for its neighbours and needs to be significantly changed. I also consider that Guthrie Road is very busy with Clifton College pupils in term times and so steps must be taken to maximise their safety during the construction of this development. This could best be achieved by the implementation of a Construction Management Plan. As I note that no such document is provided in support of this application, I would suggest that it is necessary to devise one forthwith. This strategy must be based on the premiss that works access to the site is obtained only from Clifton Down Road and the large vehicle are not routed through the surrounding residential areas. Overall, therefore, whilst this proposal has much to commend it, I feel that it has a number of fairly obvious shortcomings which must be addressed before it is approved. Under these circumstances I must object to it. Paul Johnson Town and Transport planner</p>	
297.	O	<p>The updated plans remain wholly inappropriate in an area of conservation. The proximity to the school, the Downs and a Residential neighbourhood has not been considered in proposing a huge block of flats that are an eyesore. I'm not opposed to development but I can see no sensitivity demonstrated here. Strongly oppose</p>	08-Nov-22
298.	O	<p>I have not seen any part of the revised plan which considers the impact on the neighbourhood, surrounding schools, traffic and conservation area.</p>	08-Nov-22

299. O	<p>I fully object to the proposed plans as they stand for the following reasons: Major concern over the height of the new buildings. They will limit light to the surrounding homes, school and frankly make no sense in a conservation area. Furthermore, the school grounds and buildings will be overlooked. Whilst I appreciate the need for homes - this is a completely inappropriate site. Due to size of the plot 200 homes requires a 'high rise' modern type build, will increase traffic (in an already busy area), reduce air quality, create major safety issues for the neighbourhood and 2 large schools and destroy the feel of the conservation area. Why does it have to be 200 homes - I fail to see the rationale for this number in this particular area. The overall management of the build in an area with constant flow of school traffic and children is a major concern. The area already suffers from unsafe drivers. I can't see a construction management plan. Whilst it would be wonderful to see this historic site continue to benefit Bristol - this current plan appears to benefit the pockets of the developers at the detriment of those who actually reside in Bristol.</p>	08-Nov-22
300. O	<p>Whilst being broadly in favour of this site being used for a mixture of private/social housing and public access and welcoming many of the proposals for the open areas, I continue to be concerned about two aspects that these revised proposals fail to address: I remain of the opinion that the design of the flats surrounding the site is not in keeping with neighbouring properties in the conservation area and that they are too tall to fit in comfortably. No attempt has been made to design them to harmonise with local building styles and it is imperative that such an important and sensitive site should benefit from more sympathetic and appropriate new construction. The proposals for managing the open areas still fail to provide adequate safeguards for ensuring public access in perpetuity. The proposed funding model means that residents will have a strong incentive for restricting access - this could be mitigated by establishing a trust fund at the outset for maintenance of the grounds using funding provided as a condition of granting planning permission. Without adequate funding the gardens and buildings will soon deteriorate.</p>	08-Nov-22



301. O	<p>There is much to be welcomed in this proposal, and it is clear that the provision of a public open space and the construction of additional housing is an appropriate use for this much-valued site. However, having read through the documentation I am left with two major concerns: The first centres on the quality of the design of the proposed residential buildings and their scale. The impression I get from the plans is that three of the four sides of the site will be dominated by monolithic slab-sided blocks that tower over the surrounding buildings, rather than enhancing them, and do not fit in with the character of the conservation area. Why is it not possible to design buildings that are sympathetic to those around them, and why is it necessary to seek to build five/six-storey blocks when those in the rest of the area do not rise above three storeys? I urge planners not to accept second-rate design and not to allow over-development, and accordingly to reject the current designs and insist on lower buildings. The second arises from the issue of public access. I applaud the proposals with regard to the open space in the centre of the development. However, I believe that there are insufficient safeguards to guarantee public access in perpetuity and that there is inadequate financial provision for ensuring that the gardens are properly maintained in the long term. Any permission granted must be contingent on an appropriate sum of money being set aside to provide for the maintenance of the site and for a suitably robust management structure being put in place to oversee its maintenance.</p>	08-Nov-22
302. O	<p>I note that there is no guarantee of perpetual public access to the gardens. Indeed, access gates with keypads, such as are proposed for the pedestrian gate on the boundary alongside Clifton Down Road, are definitely not 'open access'. Whilst the site is currently gated, there is no reason for this to be perpetuated. To create a ghetto, albeit one with wealthy residents seems undesirable. The revised proposals do not address the concerns raised by myself among others to the original high density and physical height of the block of flats, N1 etc. . Amendments to the layout within the blocks are immaterial when the block itself is the problem.</p>	09-Nov-22
303. O	<p>Whilst it seems inevitable that the Zoo site will be used for building it is still important that the area be used for the benefit of as many and diverse individuals as possible. This includes access as an open space and housing provision for people of limited means or with disability. It seems sad that the committee in charge of housing development should be willing to accept a 20% provision of such accommodation in return for a guarantee of the work being commenced quickly (short term benefit) whereas the full 40% legal requirement would be of major long term benefit. The original much vaunted open access to the site and provision for its long term maintenance now seems at risk. The suggestion that ongoing costs of this should be borne by the residents ( apart from those in social housing) and this necessitates the maximum number of residents and the minimum of those in social housing is a spurious way of reducing the % of social housing. I would suggest that there should be a sum of money put in trust by the developers for the grounds maintenance from the outset.</p>	09-Nov-22

304. O	<p>The density of the proposed housing, in particular high rise Block N, is too great for the area. The character of Clifton Down Road is of individual buildings the majority of which were originally designed as single family dwellings although I accept that some are now subdivided into flats. A monolithic high structure would adversely impinge on the area and should be avoided. The existing boundary wall currently conceals the buildings within the zoo grounds, that should remain its purpose.</p>	09-Nov-22
305. O	<p>The proposed housing development is totally inappropriate for this conservation area. - It is too high on all sides of the site and blocks light and openness. - It is too dense, extensive and flat/block-like, looking more like a fortress - the design is really poor quality. - The appearance is not in keeping with the Victorian and other houses in the area. - It causes the loss of mature trees that provide oxygenation, habitat for birds and other fauna - It causes the loss and destruction of world- renowned herbaceous borders that mean the loss of flora and fauna - There is no protection for public access to the whole area, in perpetuity. - The density of the building will require extensive parking on site. There is insufficient street parking already so there is no space for the cars of additional residents. Nobody can reasonably believe that the home buyers will not have cars that need parking. The area has already suffered from traffic pollution and additional cars parked or coming into the housing will place a heavier burden on the area in terms of traffic crowding and pollution. The roads around the site are small and mainly reduced to single flow traffic which can already be prone to bottle necks. This will pose a danger to children at the adjacent school. Overall, the scale, density and height of the development is wrong for the area and the impacts beyond just the building have not been considered. The site has a long history of being a public amenity as gardens and should continue as a public amenity, or at the very least be primarily a public amenity with some low rise housing on the place of existing buildings. I believe that there are insufficient safeguards to guarantee public access in perpetuity and that there is inadequate financial provision for ensuring that the gardens are properly maintained in the long term.</p>	09-Nov-22

306. O	<p>As a resident of Northcote Road, I wrote in July 2022 and then again in November 2022 to outline some of my objections to Bristol Zoo's proposals for building large residential buildings on the main Zoo site. Since then our Northcote Road Residents' Association has received the final report from the professional organisation which we commissioned to carry out a light survey - outlining the light issues which would affect all eight of the houses in our road - caused by the planned building of the blocks of flats in such a very close proximity to our houses. You are most likely aware that the Zoo planners do accept that the houses in Northcote Road would be the most seriously affected by the new buildings so I hope that you will be making special note of the objections brought forward by Northcote Road residents. It is clear that the enormous height and form of the proposed buildings will have a more overbearing impact than I had anticipated. Despite some assurances given to us during several Zoom meetings with the planners, no significant adjustments have been made from the original plans - our suggestions have been disregarded. It is now clear that the proposed buildings will totally change the environment of all the dwellings here. Top floors will lose their views completely. The main living room in my flat, which I have long claimed to have one of the best views in Bristol, will lose this view completely as well as a significant amount of sunlight during the day. Flats and floors lower down within all six houses in Northcote Road will lose much more daylight of course. All of us living in this road are likely to experience a feeling of being enclosed by these buildings. I am not objecting to the principle of new housing being built on the main Zoo site (though I am very much more in sympathy with the "Save Bristol Zoo Gardens" campaign) - it is principally the height of the buildings proposed all round the perimeter which I object to. I should add that the actual loss of light and views to our homes has only become clear when I looked at the new visualisations that the Northcote Road Residents Association have commissioned. The Zoo's published images for what Northcote Road would look like are seriously misleading. In general, it is clear that more and more people living in Clifton, as they find out about the Zoo's plans, are realising that that the proposed flats would be totally unsympathetic and out of character with being placed in a Conservation Area. I urge you to reject these plans.</p>	10-Nov-22
--------	---	-----------

307. O	<p>I wrote on July 4th 2022 to object strongly to Bristol Zoo's proposals for building large residential buildings on the main Zoo site. I write as a resident of Northcote Road, immediately adjacent to some of the enormous blocks of flats being proposed. Since my last letter, revised proposals have been submitted by the Zoo. My original criticisms remain but I would like to make some additional comments. The Zoo has made the most minor and cosmetic of adjustments to their plans and these revised plans just do not address (at all) the concerns raised by myself and my neighbours. The plans for high density and totally inappropriately tall blocks of flats remain and the proposed development is quite clearly totally inappropriate for this conservation area. The visualisations commissioned by one of my neighbours show clearly the completely overwhelming impact the buildings will have. It is no exaggeration to say that they will have a devastating impact on the totality of the local environment - and not just where I live in Northcote Road. The massive block housing developments proposed - very close to the adjacent roads (some of which are very narrow) - are totally out of character with the environment of this part of Clifton. A few particular points arising out of comments made recently on the planning website (Summary of Design Changes and Revised Documents): - The planners have stated that the buildings opposite Clifton College are "in keeping with the local character". Having lived and worked within the buildings of Clifton College for 34 years, I assert that this statement is very wide of the mark. - I dispute the statement that "a traffic analysis demonstrates that the proposed development would generate less traffic than the average daily traffic associated with Bristol Zoo and would cause a reduction in local on-street parking". I have observed local traffic and parking in the area (Northcote, Guthrie and College Roads) for over 40 years (at all times of day) and, knowing the number of units of accommodation proposed and about the limited amount of parking which will be provided on site, I cannot accept this statement. - It is also stated that the noise during the construction phase is not being considered as part of the Noise Impact Assessment. I would suggest that it is vital that consideration of the noise impact during construction should be included as this will be of huge importance to local residents over a period of, I estimate, 5 years of clearing the site and construction of new buildings. The noise and general impact of such a large construction site - in very close proximity to many living spaces - is likely to be enormous and, I predict, is very likely to have a seriously adverse effect on the mental wellbeing of local residents, myself included. Finally, I would like to express great concern about the future of the Zoo's Education Centre (next to the Clifton College Music School). This was a new build just a few years ago and, as I have seen myself, it is a "state of the art" building able to be used for all kinds of educational purposes. As I walk past it each day, I can see that it is, thankfully, still being used. However, the proposed building plans have one of the large residential blocks in the place where the education centre now sits. This obviously means that the Education Centre will be demolished. This is nothing short of criminal - to destroy such a new and useful facility; a terrible waste of resources. I know that the Zoo plans to build a new Education facility at The Wild Place but this will cost a great deal of money and, being much further from the centre of Bristol, make it more difficult and costly for students to reach. This - and the elimination of the wonderful herbaceous border - are just two examples of the needless destruction that will take place if the Zoo's plans are allowed to go ahead. I urge you to reject these plans</p>	10-Nov-22
--------	---	-----------

308.	O		10-Nov-22
309.	O	<p>My original objection is pasted below and I see little in the revised planning proposals that counters any of the points previously made by me or other objectors. Savills have proffered a reduction in the number of residential units from 201 to 196 and a tacit acknowledgement that the space within its footprint would soon become ghettoised, necessitating the imposition of opening hours for the gardens. That does not translate into the returning of this part of our city's landscape to the people of Bristol. In short, the revisions comprise slightly fewer ugly boxes crowbarred into a wholly flawed concept. Original Objection: The developer's ability to put housing on this site obviously provides its motivation for pressing forward with this development and the funding to relocate the zoo. But the plans are wholly inadequate for several reasons: 1) Unhampered public access to this space which surrounded by high walls and the proposed housing will create an unsafe ghettoised space, especially after dark 2) The proposed new buildings are utilitarian, almost comedically Stalinesque, over-storeyed, and will self-evidently prove, if they are built, to be an utter eyesore talked about for years afterwards as the Clifton Carbuncle. What ever possessed the architects, planners or others to proffer such a build? 3) There is inadequate provision of social housing and first homes 4) The plan encourages car usage contrary to the sustainability policies put in place by Bristol City Council. 5) More imaginative schemes, even ones focused on creating a social/community space, and one that has a wider geographical, i.e., regional, draw would be infinitely preferable to this proposed plan. There is other less expensive derelict and unused land in the City that would be far more adequate and provide better affordable housing. The leaflet pushed through Clifton letterboxes recently is insulting. The implied choice to be made is a false one. One can support both good development and conservation action; one need not come at the expense of the other.</p>	10-Nov-22

310. O	<p>The developer's ability to put housing on this site obviously provides its motivation for pressing forward with this development and the funding to relocate the zoo. But the plans are wholly inadequate for several reasons: 1) Unhampered public access to this space which surrounded by high walls and the proposed housing will create an unsafe ghettoised space, especially after dark 2) The proposed new buildings are utilitarian, almost comedically Stalinesque, over-storeyed, and will self-evidently prove, if they are built, to be an utter eyesore talked about for years afterwards as the Clifton Carbuncle. What ever possessed the architects, planners or others to proffer such a build? 3) There is inadequate provision of social housing and first homes 4) The plan encourages car usage contrary to the sustainability policies put in place by Bristol City Council. 5) More imaginative schemes, even ones focused on creating a social/community space, and one that has a wider geographical, i.e., regional, draw would be infinitely preferable to this proposed plan. There is other less expensive derelict and unused land in the City that would be far more adequate and provide better affordable housing. The leaflet pushed through Clifton letterboxes recently is insulting. The implied choice to be made is a false one. One can support both good development and conservation action; one need not come at the expense of the other.</p>	10-Nov-22
--------	---	-----------

311. O	<p>Having read the updated design documents there are no material changes to alter such an inappropriate development for the site, in particular the over sized "blocks" of flats, so there is still some obvious areas where significant changes and improvements must be made. Key issues; - Height of development not in keeping with surrounding buildings &amp; conservation area - Loss of a unique amenity for the whole of Bristol in a unique and irreplaceable site/area - New buildings because of significant height increase will overlook into school areas - New buildings because of significant height increase will mean loss of light to existing properties - Negative visual impact on existing buildings close by of significant architectural appeal - Road safety and traffic impact on what are already congested small city streets (all of which surrounding the site are in effect single track), with significant pedestrian use by school children - Allowance of public traffic/cars onto the site for the first time in its history seems wholly inappropriate - Limited access to the site/gardens for the public Bristol &amp; the Zoo should be leaving a far better legacy on a site that has sustained them for 200 years - the current scheme's approach appears to be simply squeeze as many units on the site that they can get away with, rather than leaving a legacy that is appropriate for both Bristol, Clifton and the Zoo. Whilst I understand and support the need for more new homes especially affordable in our city, adding 201 homes is very minor. Also I note 80% of the properties proposed do not need to be "affordable" so I'm sure will some be the most expensive properties in Bristol in terms of price per square foot - therefore I believe this scheme in its current form is wholly inappropriate and I hope will be refused until a scheme is proposed that befits this wonderful site and our city. We will only get one chance at getting this development right so please reject this scheme in its current form!</p>	10-Nov-22
--------	---	-----------

312. O	<p>Having read the design documents as well as comments made by others, there are some obvious areas where significant changes and improvements must be made. Key issues; - Height of development not in keeping with surrounding buildings &amp; conservation area - Loss of a unique amenity for the whole of Bristol in a unique and irreplaceable site/area - New buildings because of significant height increase will overlook into school areas - New buildings because of significant height increase will mean loss of light to existing properties - Negative visual impact on existing buildings close by of significant architectural appeal - Road safety and traffic impact on what are already congested small city streets (all of which surrounding the site are in effect single track), with significant pedestrian use by school children - Allowance of public traffic/cars onto the site for the first time in its history seems wholly inappropriate Bristol &amp; the Zoo should be leaving a far better legacy on a site that has sustained them for 200 years - the current scheme's approach appears to be simply squeeze as many units on the site that they can get away with, rather than leaving a legacy that is appropriate for both Bristol, Clifton and the Zoo. Whilst I understand and support the need for more new homes especially affordable in our city, adding 201 homes is very minor. Also I note 80% of the properties proposed do not need to be "affordable" so I'm sure will some be the most expensive properties in Bristol in terms of price per square foot - therefore I believe this scheme in its current form is wholly inappropriate and I hope will be refused until a scheme is proposed that befits this wonderful site and our city. We will only get one chance at getting this development right so please reject this scheme in its current form!</p>	10-Nov-22
313. O	<p>The revised Biodiversity Metric 3.0 calculation is in a file type that not available to everyone who might be interested and should be substituted with the information in the generally used .pdf file type. This important environmental document is presented in the superceded Biodiversity Net Gain Metric 3.0. This version had flaws in the way certain entries were used in the calculation which slewed the results to give a misleading result. These flaws were responsible for giving a results that were unrealistically optimistic. Biodiversity Net Gain Metric 3.1 is now the current version with this problem rectified and has been available for about a year. It is the version that is incorporated in the forth coming Environment Act 2020 legislation. A city that declared an Ecological Emergency in 2020 could be expected to use the currently available standards as a minimum. Perhaps the City Planning Department should require this and other all applicants to use the current version for Biodiversity Net Gain calculations.</p>	10-Nov-22
314. O	<p>The removal of a number of historic buildings and trees are concerning for the area. building new homes but not providing parking is not a good thing. I am all for development but the loss of things that make Clifton and Bristol so good, is sad. I suggest that this goes back to the board so it can be revised in better keeping with the area and is more supportive.</p>	14-Nov-22



315.	S	I believe this application meets all the necessary planning guidelines/policies and would deliver much needed additional housing into Clifton, including affordable homes. it is also a very attractive development and allows the central historic gardens to be open to the public for free. The development of the site will allow the Zoo to continue its development of a new Bristol Zoo at its Wild Place site together with its ongoing conservation and education work, which would benefit everyone living in the Bristol area and beyond.	15-Nov-22
316.	S	My family are lifetime supporters of the Zoo. This planning permission will facilitate the development of a New state of the art Zoo. This development of the existing Clifton site will bring much needed houses, allow Public access to the beautiful gardens, and provide a new cafe and meeting space in the iconic entrance building. This development must be good for Bristol as a whole.	15-Nov-22
317.	O		21-Nov-22
318.	O	I am objecting again to the proposed development as it contravenes the Bristol Development Framework Core Strategy Policy BCS22 by failing to 'safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance', namely the site of Bristol Zoo Gardens. The modifications to this Application are minor and are clearly contrary to BCS 22. The proposed development is over intense, unsympathetic to the period and style of the adjacent buildings and negatively impacts them. It will adversely affect this part of the Clifton Conservation Area and the setting of its listed buildings, views shared by Bristol City Council's Conservation Advisory Panel. The National Planning Policy Framework states that heritage assets should be sustained and enhanced and that 'great weight should be given to the asset's conservation' (para 199). It continues that 'local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.'(para 206). This proposed development does not ensure this or meet these criteria. There is a shortage of affordable housing in Bristol and it is very disappointing that the provision in this scheme will be reduced by half so that the work can start more quickly and a greater number of non-social housing residents can cover the ongoing costs of the long-term maintenance of the site. This appears to be a back handed way of reducing the affordable housing provision which obviously does not generate the level of income that the other units might do. This approach is both short sighted and short-termist. The issues caused by traffic from the 196 proposed units will severely impact the area around the site. It is naïve to expect that residents will not have cars and those numbers are likely to be higher than the numbers suggested by Bristol City Council's calculations. The area already has traffic issues at school drop off and pick up times. It is also an area that is frequented by school children throughout the day. The amount of traffic that this development will produce will lead to it being unsafe for school children (4-18 yrs olds) to circulate during the day. The views of Northcote Road as submitted on 13 January are very deceptive. They present Northcote Road, with the proposed development, as light and airy. The road is not like that now even on a bright, sunny day. The views also omit to show the southern end of Northcote Road with the extreme height and massing of building E3. The views presented by the developer are misleading and misrepresentative and do not clearly show	22-Nov-22

	<p>the effects of the height and scale of the proposed development. Building E3's height and location has not changed. It remains domineering and overbearing. Its scale and height dwarfs the other buildings in Northcote Road (see doc. BZG-PPA-ZZ-ZZ-DR-A-2602-PL1) including no 1 and no 2 Northcote road, both tall, substantial Victorian houses. Building E3 is significantly taller (8m measured to the eaves) than these and will block more light from Northcote Road due to E3's extreme height. The overall massing and scale of the proposed buildings on Northcote Road need to be reduced to ensure more light reaches Northcote Road and for reasons of safeguarding as they look directly onto the school and a number of its boarding houses. I strongly object to the proposed development in its current form and ask that it is rejected by the Planning Committee.</p>	
319. O	<p>The revised proposals have minimal changes. The interior of the flats has been amended, but little change has been made to the heights and massing of the buildings. This is a particular issue for Northcote Road and Guthrie Road where five to six storey buildings are proposed where currently the buildings are three to four storeys high. The development does not reflect the existing architecture or the historic nature of the site and area. The number of dwellings across the site will also have a significant impact on the amount of traffic in the area and on road safety, both during the construction phase and thereafter. Whilst I understand that this is an opportunity for the Zoo to safeguard its long-term future, it is very disappointing that the proposals are less than sympathetic to their surrounds and that little consideration has been given to innovative and thoughtful design and how it can sit well within a Conservation Area. I therefore strongly oppose this development for the reasons listed above and in my original objection of 6 July 2022.</p>	22-Nov-22

320. O	<p>I am objecting to these proposals as a parent for the following reasons: 1. Road Safety. I have serious concerns about road safety as the scheme is in close proximity to a large school consisting of both day and boarding pupils. The pupils are obliged to move around their campus to access different classrooms, sports fields etc. and the proposed scheme will cause an increased level of traffic, both during the construction phase and afterwards. This will jeopardise the safety of children moving around their school site. The entrances proposed for Guthrie Road and Northcote Road will have a particular impact as they are two of the main areas where parents pick up and drop off children. At peak times, there are already traffic jams, poor parking and bad driving and this will only be exacerbated by an increased number of cars. Entrances here are likely to significantly increase the risk of accidents to school children. 2. Parking. The scheme proposes 201 dwellings with 120 car parking spaces. This will not be enough parking spaces. While it is desirable and necessary to reduce car use, the reality is that most households have at least one vehicle. Where are these extra vehicles going to park? Again, the impact of this is increased traffic on the roads around the Zoo looking for parking spaces and once again, there will be an increased risk to children's safety. 3. Design. The design of the buildings is poor and lacks harmony in relation to its site. The surrounding Conservation area and the buildings adjoining the site consist of detached houses and imposing, listed school buildings broken only by trees and green spaces. These bear no relation to the proposed scheme which does not sit comfortably in this context. The buildings are too tall, overbearing and constitute a solid mass with no redeeming features. Inspiration seems to have been Stalinist Russia with a few plants added, perhaps to soften the corners, or to allude to the listed gardens that once occupied the site. The scheme does not reflect or relate to the pink sandstone of the neighbouring buildings, nor does it relate to the materials and colours of the Zoo's perimeter wall. Its sits in ugly contrast with its surrounds and will be an eyesore that is likely to date quickly. The new buildings are concentrated around the perimeter of the Zoo's site causing neighbouring houses, school playgrounds and boarding houses to be completely overlooked. In some instances, the new buildings are taller than the existing houses and the school being overlooked is a safeguarding issue. Will all the windows overlooking the school have opaque or frosted glass? This scheme is an opportunity to develop an historic and much-loved Bristol site. It is an opportunity to come up with innovative and thoughtful design, showcasing how a contemporary development can enhance a site bound by Conservation Area regulations. This scheme fails on all counts. It is pedestrian, lacklustre and is missing the vision and thoughtful consideration given to the historical context and site surroundings in local developments, such as the ss Great Britain and Wapping Wharf.</p>	22-Nov-22
321. S	<p>Dear Sir, I am writing in support of the above planning application and thoroughly approve of all of the changes made in Savill's cover letter, Planning Statement and supporting documents. Yours faithfully Miriam Hare ( Mrs )</p>	23-Nov-22

322. S	I think the planned proposal responds sensitively to its setting. I approve of its sustainability proposals, and as someone whose ancestor, Francis Adams, sold the land to the Zoo in the first place, I like the way that some of the historical buildings including the Aquarium are being conserved. I particularly approve of the public access to the gardens in the daytime and of delivering 200 high quality eco friendly new homes for Bristol.	23-Nov-22
323. O		24-Nov-22
324. O	<p>It is acknowledged that the re-use and re-development of a facility that was originally developed and evolved over many years for a specific use is challenging. However, that does not mean that the scheme as proposed is acceptable. There is significant concern with the proposed quantum and scale of development, the poor quality of the architecture, the site layout and the adverse harm that would be caused to the character and appearance of this part of the Clifton and Hotwells Conservation Area and the setting of the listed buildings. This is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over intensive with a consequential poor relationship with the adjacent School and its listed buildings. The north building at 6 storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular, the Bear Pit would be overly dominated by new development. There are concerns with the impact on retained green infrastructure. Particularly with regard to the buildability of the quantum of development whilst retaining the specified trees. There are significant questions over the long term maintenance of the proposed public space. The gardens are a locally listed heritage asset. The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site. Consequently, it is considered that the proposal would neither sustain nor enhance the significance of relevant heritage assets including the Conservation Area and listed buildings within and without the site. It would provide insufficient substantial public benefit to outweigh the substantial harm caused by the impact of such a poor scheme on the relevant heritage assets. It is not considered that this scale of development can be justified in a heritage context. Moreover, it accords with neither the relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported.</p>	24-Nov-22

325. O	<p>The issues caused by traffic from the 196 proposed units will severely impact the area around the site. It is naïve to expect that residents will not have cars and those numbers are likely to be higher than the numbers suggested by Bristol City Council's calculations. The area already has traffic issues at school drop off and pick up times. It is also an area that is frequented by school children throughout the day. The amount of traffic that this development will produce will lead to it being unsafe for school children (4-18 yrs olds) to circulate during the day. The views of Northcote Road as submitted on 13 January are very deceptive. They present Northcote Road, with the proposed development, as light and airy. The road is not like that now even on a bright, sunny day. The views also omit to show the southern end of Northcote Road with the extreme height and massing of building E3. The views presented by the developer are misleading and misrepresentative and do not clearly show the effects of the height and scale of the proposed development. Building E3's height and location has not changed. It remains domineering and overbearing. Its scale and height dwarfs the other buildings in Northcote Road (see doc. BZG-PPA-ZZ-ZZ-DR-A- 2602-PL1) including no 1 and no 2 Northcote road, both tall, substantial Victorian houses. Building E3 is significantly taller (8m measured to the eaves) than these and will block more light from Northcote Road due to E3's extreme height. The overall massing and scale of the proposed buildings on Northcote Road need to be reduced to ensure more light reaches Northcote Road and for reasons of safeguarding as they look directly onto the school and a number of its boarding houses. I strongly object to the proposed development it is all too high and out of keeping for the conservation area and historical buildings are lost.</p>	28-Nov-22
--------	---	-----------

326. O	<p>The proposed redevelopment of Bristol Zoo Gardens is completely out of keeping for the conservation area of Clifton. The modern blocks of flats above the perimeter walls tower above the street and gardens. These monolithic blocks are entirely incongruent with our area in design, scale, mass and form. They will overwhelm the gardens and obliterate street views of the sky, mature trees and the glimpses of historic buildings that characterise Clifton. A construction project on this scale in a conservation area will completely detract from the desirability and preservation and enhancement of the character of the area. The scale and design may be suitable in a city centre, but is surely inappropriate for our conversation area and looks like something more suitable for Disneyland with hideous balconies with stencils of animals and a humongous 6 storey high green brick giraffe on the side of a building. We were led to believe that the sale of the Zoo Gardens was to pay for new enclosures at Wild Place, but this does not seem to be the case as only the Gorillas and one species of lemur are being relocated! The rest have been shipped off to other zoos, this was not the impression we were given when the Zoo needed to maximise the value of this site. The Zoo is retaining some communal garden space, but it is expected that over 150 mature trees will be removed for this hideous proposed development along with the historic ornamental garden. The towering blocks of flats around the perimeter will not make the communal garden space desirable. The proposed housing development on the north side along Clifton Down and the east side Northcote Road show a building of almost 300 metres of monolithic, uninterrupted block of flats up to 6 storeys high, towering over the existing high perimeter wall and dominating the neighbouring historic buildings. On the north side along Clifton Down from the historic zoo entrance is 150 metres of monolithic, uninterrupted blocks of flats rising to 6 storeys high, some 60ft taller than existing high perimeter walls. Along Guthrie Road near Clifton College's historical buildings the scale is once again overwhelming and completely out of keeping for an area like Clifton in a conservation area. It has to be opposed until a more moderate low level development (3 storeys high max) is proposed that is in keeping with the conservation area and not in some cheap brick with giraffes on the side which is completely out of character with the bath stone and other quarried stone already seen so much in the surrounding roads.</p>	28-Nov-22
--------	--	-----------

327. O	<p>We OBJECT to the above planning application for the following reasons - Out of keeping with the conservation area - Over developed and way too high buildings - Overlooks the boarding houses and playgrounds of Clifton College so is a safety hazard and completely unacceptable. - Congestion of an extra 200 residents in the roads already very congested, there are not enough parking spaces provided within the development and the surrounding roads are already congested enough. - Extra traffic is a safety issues to both Clifton College and Clifton High School - Demand on services, hospitals and doctors in the area are already oversubscribed - Schools in the area are already oversubscribed - The strutures proposed are too tall and cover the whole perimeter of the existing zoo, a block of grey is incredibly ugly and out of keeping for this area of outstanding beauty with Durdham Downs. - 4-6 storey buildings proposed, a 6 storey building on the northern boundary by the Downs is completely unacceptable for local historic buildings and architecture and completely out of keeping. - The plans drawn up are deceptive and shown green space in the middle, however the whole perimeter is surrounded with a mass of 4-6 storey buildings looking into Clifton College and surrounding houses gardens, bedrooms etc</p>	28-Nov-22
328. O	<p>The proposed planning application is completely inappropriate for a conservation area. The proposed buildings are way too big - they are very unsympathetic to the surrounding area and tower over the existing adjacent buildings. The proposal is hideously out of character with the surrounding conservation area and I strongly urge the council reject it.</p>	28-Nov-22

329. O	<p>I strongly object to the proposals insofar as they relate to the southern end of Northcote Road in particular. There have been only minor changes to building E2 and no changes at all to building E3. Contrary to the impression given (for instance Penoyre &amp; Prasad's answer to Q2 raised by Clifton College, as set out in Appendix 5 of the October 22 Planning Statement), building E3 has been set no further back than shown in the October 2021 consultation, nor has it been reduced in height. Building E3 itself dwarfs the other buildings in Northcote Road in scale and height, as is clearly shown in document BZG-PPA-ZZ-ZZ-DR-A-2602-PL1. What is not shown so clearly in that document is its height in relation to numbers 1 and 2 Northcote Road, both substantial Victorian houses. Based on the proposals, building E3 would be over 8 metres taller (measured to the eaves) or 6.5 metres taller (measured to the ridge) than these houses, contributing strongly to the overbearing effect. I have previously raised a concern as to the adverse impact on the front gardens of numbers 1 and 2 Northcote Road from overshadowing, particularly the loss of afternoon and evening sun. I do not believe that this has been addressed. The gap between buildings E2 and E3 is of limited benefit to those neighbours who are positioned further along Northcote Road, particularly towards the southern end, where the unrelenting mass of building E3 will dominate. The daylight and sunlight assessments show adverse impacts to several rooms in residential properties in Northcote Road, beyond BRE guidelines, with rather trite comments such as 'retained daylight levels are considered acceptable' or 'the neighbouring residential properties will generally remain with adequate levels of daylight and sunlight'. To whom they are considered acceptable is unclear, but it is certainly not the owners of the properties concerned. Nor does there appear to be any recognition that it is generally the principal reception rooms (those on the lower floors) that are worst affected, and where the loss of residential amenity will be most felt. To summarise, those residents towards the lower (southern) end of Northcote Road are particularly severely impacted by the proposals, largely because of the extreme height of building E3 and its proximity to neighbouring properties, but also because it is positioned in such a way that it will take away much of the afternoon and evening sun. Without a significant reduction in the scale of this building, I urge the planning committee to reject the proposals.</p>	28-Nov-22
--------	---	-----------



330. O	<p>I wish to reiterate my objections to the proposed development. I am extremely disappointed that, despite our having raised objections on numerous occasions throughout the consultation process, the applicants have made no changes of any significance to the proposed Building E3. This building is, quite simply, far too tall relative to existing neighbouring properties in Northcote Road. This is in a Conservation Area whose character should be preserved if the term is to mean anything at all. As it stands, building E3 would tower over neighbouring properties, dominating the outlook even from upper floors, and casting lower floors and front gardens (which currently enjoy a sunny outlook) into shadow for much of the day. The effect on those of us living in the area in terms of mental health and wellbeing would be devastating. Quite apart from the issue of height, the proposed buildings are not at all sympathetic to their surroundings: the overall design of the site, comprising high blocks placed around the perimeter, has the appearance of the worst sort of gated community, designed to keep people out rather than to contribute to the wider community. If the site is to be developed for housing, then please make it more sympathetic to its surroundings to avoid doing irreparable harm to buildings that have stood there since the Victorian era, as well as their residents. This could be done by reducing the height and massing of buildings and setting them further back from the perimeter.</p>	28-Nov-22
--------	--	-----------

331. O	<p>I strongly object to the proposals insofar as they relate to the southern end of Northcote Road in particular. Contrary to the impression given (for instance Penoyre &amp; Prasad's answer to Q2 raised by Clifton College, as set out in Appendix 5 of the October 22 Planning Statement), building E3 has been set no further back than shown in the October 2021 consultation, nor has it been reduced in height. Building E3 itself dwarfs the other buildings in Northcote Road in scale and height, as is clearly shown in document BZG-PPA-ZZ-ZZ-DR-A-2602-PL1. What is not shown so clearly in that document is its height in relation to numbers 1 and 2 Northcote Road, both substantial Victorian houses. Based on the proposals, building E3 would be over 8 metres taller (measured to the eaves) or 6.5 metres taller (measured to the ridge) than these houses, contributing strongly to the overbearing effect. I have previously raised a concern as to the adverse impact on the front gardens of numbers 1 and 2 Northcote Road from overshadowing, particularly the loss of afternoon and evening sun. I do not believe that this has been adequately addressed. The gap between buildings E2 and E3 is of limited benefit to those neighbours who are positioned further along Northcote Road, particularly towards the southern end, where the unrelenting mass of building E3 will dominate. The daylight and sunlight assessments show adverse impacts to several rooms, beyond BRE guidelines, with the rather trite comments that the 'retained daylight levels are considered acceptable' or 'the neighbouring residential properties will generally remain with adequate levels of daylight and sunlight'. To whom they are considered acceptable is unclear, but it is certainly not the owners of the properties concerned. Nor does there appear to be any recognition that it is generally the principal reception rooms (those on the lower floors) that are worst affected, and where the loss of residential amenity will be most felt. Those residents towards the lower (southern) end of Northcote Road are particularly severely impacted by the proposals, largely because of the extreme height of building E3 and its proximity to neighbouring properties. Without a significant reduction in the scale of this building, I urge the planning committee to reject the proposals.</p>	28-Nov-22
--------	---	-----------

332. O	<p>Any development in a conservation area should have to answer the basic question of whether or not it improves or, at a minimum, conserves the area in which it is sited. This proposal does neither and is quite clearly detrimental to the area in its scale, monolithic and repetitive nature and lack of public amenity. I have no doubt that it, or something very similar, will land on this site. But that represents multiple failures in three particular areas. Firstly, it is obviously an attempt by the site owners and developers to simply maximise profit at minimum effort to themselves with scant consideration for historic buildings and conservation factors other than as necessary to greenwash the proposal through the process. You set yourselves a low bar and barely crawled over it. Secondly, it is a failure of imagination and competence by the architects. Seven years of training to design that? Walk around Clifton, open your eyes and think for half an hour. It is hard to conceive a site in Western England which represent such an opportunity to design something wonderful and organic. It is equally hard to imagine anything which better fails to reach anywhere near that goal. Thirdly, it is a failure of the planning process to achieve the simple goal of improving and conserving this environment. I recommend a journey on the newly opened Elizabeth line stopping at every station along the way to have a look at what can be achieved. Then look back at this and ask yourselves why you have failed so badly. Thankfully talent and determination still exists in places. None of it appears to have been applied here. Local views will no doubt be ignored and you will build your totally average pile of steel, concrete and glass. Just don't expect anyone who lives here to be thankful for your efforts.</p>	29-Nov-22
333. O	<p>I think the city of Bristol should decide what the best use of this iconic, historic and quasi-public site could be for the benefit of everyone and not just maximising the Zoo's profit margin. For example, Bristol Zoo carrying on but in a modified form, a 'Bristol Kew Gardens', Our World Bristol's proposal for an augmented reality zoo or another type of visitor attraction. The Zoo's planning proposal is advocating for the loss of at least a third of the trees across the gardens. The Zoo's own website describes their gardens as "one of the UK's most important collections of plants" and "170 years of nurture and gardening artistry." The iconic herbaceous border pictured above will be bulldozed and become someone's multi-million pound home. How can the Zoo - a conservation charity dedicated to fighting climate change - justify destroying any of these gardens - against the backdrop of Bristol being a Green Capital and the current climate crisis? Only a fraction of the site will be available to the public. The Zoo offers no guarantee that the gardens will stay open to the public in the long term. There are many other solutions and options that the Zoo could explore and pursue if they would listen and engage. If it was proposed that London, Dublin or Berlin Zoo were to be sold off for private housing there would no doubt be significant public outrage. Bristol is not a capital city but the principal remains the same. The Zoo's desire to bankroll their new attraction in South Gloucestershire is a completely separate issue from the sale and future use of this site.</p>	29-Nov-22

334. O	Bristol claims to be a green city yet is willing to destroy one of the most diverse gardens it has. Removing nearly 46.5% of the current unique trees that the historic Bristol zoo contains. Why not convert this area into a Bristol Kew Gardens equivalent? Let's drive more tourism rather than creating more exclusive tower blocks that will damage the environment. Let's keep the zoo's history and maintain it as an exciting place for people to visit across the generations.	29-Nov-22
335. O	I object to the current proposal for the zoo site. It is completely out of character with and will destroy the conservation area. The current proposals appear to be based on maximum profit without any consideration for the environment, conservation or legacy. If an individual made an application to add any building of a similar sort to their residence or anywhere on their property in this area, it would be rejected immediately. Why do different planning rules apply to big business? I cannot believe that a proposal that is so incompatible in its design with and so opposite to the very essence of a conservation area has been allowed to be submitted after pre-application enquiries and advice and is in accordance with The Major Applications Protocol. I am unaware of any local support for the proposal. I understand that the site will be developed but would hope that a more imaginative design that preserves and enhances the historical conservation area for future generations could be developed.	29-Nov-22
336. O	The revised plans have done nothing to improve the overall hideous size and appearance of this proposed development. The huge blocks of flats on the perimeter of the site are just not in keeping with the conservation area that the zoo has been part of. No consideration has been given to the affect these blocks of flats will have on existing adjacent properties . My original objection of the 6th July 2022 still stands.	30-Nov-22
337. O	I am objecting to the proposed redevelopment of Bristol Zoo Gardens for the following reasons 1 An unacceptable number of over 200 residential units in a relatively small site putting strain on local service provision 2 Rediculously high apartment blocks on all of the zoo site boundaries affecting the character of the conservation area and both light and privacy issues to properties adjacent to the zoo site 3 Insufficient parking provision on the site for the number of dwellings which will affect the neighbourhood despite the zoo's assurances 4 The planned loss of a number of mature tree specimens which despite new planting will take 50 plus years to replace 5 Increased background noise from the planned extensive use of heat pumps 6 The zoo says it cares so much for the environment and the animals in it . What about the humans that have to live with the environment that they leave as their legacy ?!	30-Nov-22

338. O	<p>I strongly object to the plans to build a luxury housing estate on the site of the Bristol Zoo Gardens. The gardens have been open to the public for 186 years. The queues of people visiting the Zoo before it closed demonstrates its significance to generations of people of Bristol. The historical and environmental damage this development will cause are not justified. The whole of the beautiful gardens and planting on this site should be preserved with its mature trees, historical herbaceous border, various ecosystems and the amazing biodiversity it offers (per the BZS website) for future generations to enjoy. Examination of the financial reports for the Zoo show that the Clifton site is financially viable. Losses have been generated by millions of pounds being spent on consultancy fees to facilitate the sale of the site. Although there were no visitors during lockdown, the Zoo received £2.5million in business continuation insurance. Indeed the Zoo generates far more money and visitors than the Wild Place. The Zoo has misled the public into believing that the sale of the Clifton site is necessary as the only option. This is not the case as the KPMG report they commissioned includes other possible courses of action - none of which were presented to their shareholders. The Clifton site is listed as a local Historic Park &amp; Garden and an Important Open Space. It should stay this way. There is much public goodwill and support to explore options that will keep this site as a public green space rather than a luxury gated housing estate "Saving Wildlife Together" is the motto of the Zoo. The Council should start by saving the wildlife and biodiversity of the Clifton site by saying No to the Planning Application.</p>	30-Nov-22
--------	--	-----------

339. O	<p>I strongly oppose the plans for the zoo gardens for the overbearing nature of the proposed blocks of flats that show no sympathy for the Clifton conservation area and the neighbouring buildings. lack of sympathy the design shows for this conservation area and its neighbouring buildings, the poor quality of the public park, loss of sunlight to neighbouring streets and the access issues around Guthrie Road. The proposed buildings give the appearance of a prison block and are totally unsuitable for a conservation area. The perimeter buildings are too overbearing, too large and extensive, too close to the perimeter and have no sympathy in scale or design to the neighbouring buildings. The new buildings completely overshadow and dominate the Zoo entrance building. The view of the site from the Downs will be a wall of modern buildings that remove the feeling of openness and visual amenity from the Downs where currently the buildings are well below the tree line. The main access point on Guthrie Road opposite the school is completely inappropriate for such a large site. This is a street with chicanes to slow traffic, which makes it hard for traffic to move along it. On top of that, the stretch of road next to the site entrance is used by the school to load and unload school buses several times each day- other streets being unsuitable for this purpose. If the main entrance is located on Guthrie Road, the number of dwellings on the site needs to be decreased significantly. The public park is hidden away within this gated community with controlled access. The wall of tall surrounding buildings will deprive the park of sunlight and make the area feel walled in. The access roads within the site represent further loss of green open space. The beautiful heritage gardens will be ripped up along with established trees. This is not conservation. The neighbouring streets will lose sunlight for much of the year as they will be overshadowed by the excessively tall, uninterrupted blocks of flats.</p>	30-Nov-22
--------	---	-----------

340. O	<p>I strongly object to the plans for the Bristol Zoo Gardens. The layout of the site, with overly tall buildings around its perimeter, and narrow gated access makes it feel unwelcoming to the public. Much of the public garden space shown on the plans is actually access road and should not be classified as garden space especially as most of the car parking spaces are in the central part of the site. There is no similarity to the amenity of the current zoo gardens. There does not seem any guarantee that once the development is completed that public access will be maintained to the gardens in the long term. Such access is more assured if the public gardens form a solid area fronting onto Clifton Downs Road rather than lost within the gated community. I object to the loss of a visitor attraction that brings people into Clifton from outside Bristol. The community conservation centre is unlikely to have the equivalent economic value to the area and this negative impact has not been taken into account in the economic report. The public gardens have been dubbed down into an area surrounded by and crossed by access roads that are overlooked and shaded by excessively tall buildings around its perimeter and within it. I object to the amount of traffic that will be generated around the local roads of the site by this volume of housing plus that of the West Car Park site. No account seems to have been taken of parking needed by visitors to the residents of these sites. The loss of the car parks on Clifton Down Road is not mentioned. These visitors and the Clifton College drop off/pick up traffic will create substantial parking problems in the area with cars driving around looking for parking spaces, on top of all the additional traffic wanting to access the site. All this excess traffic is of a concern for the safety of the pupils of Clifton College who spend a lot of time each day walking between buildings in this area. The density of the development is too great to maintain public safety around this site. I object to the design of the perimeter buildings. These are all too tall, reducing the light into the public gardens substantially. The surrounding roads will feel like dark alleyways - especially College Road with blocks of flats situated close to the road on both sides. The architectural design bears no relation to the historical buildings that have been preserved nor to the surrounding buildings of Clifton conservation area. I object to the view of the site from the Downs with its 6 storey tall buildings built up to the boundary wall. The frontage should be no more than the current two storey height.</p>	30-Nov-22
341. O	<p>I oppose this proposal primarily on the basis of its complete failure to preserve or enhance the Clifton conservation area. - Failure of the architecture to respond properly to or integrate with the surrounding established character and context - Overbearing, over-intensive and unsympathetic scale of development - Unjustified and irreversible harm to listed buildings - Appearance of a gated community, even a prison complex behind high walls, completely the opposite of what Bristol considers as its general outlook on life - Public access not legally assured - Not allowed for in the statutory local plan - Failure to give "considerable weight" to a heritage asset - Therefore not in accordance with applicable conservation legislation - Clear danger of erosion of BCC's standards applicable to future conservation area planning proposals I support the BCC Conservation Advisory Panel's submission, and that of Historic England, who have commented that the closure of the zoo site will have a pronounced harmful impact on the significance of the site (and have not withdrawn this view while giving credit for some extremely minor revisions).</p>	30-Nov-22

342. O	<p>I have read the applicants' new replies to the planning officer and viewed most of the supporting documents. My chief objection remains, relating to the failure to abide by requirements of the conservation area status of the local area and resulting incongruous and overbearing design. The latest inputs on the conservation area and heritage appear to acknowledge harm and speak of "mitigation" rather than "enhancement". There are some arguments referring to "enhancement" but they are weak or even bogus, relying on the quality of the development and public access rather than the design or density of the development. The objections based on the scale and blockiness of the buildings are unmitigated by the very minor proposals to soften the outline and to limit overlooking. The proposal says there need be enough free market dwellings to contribute about £1300 each in estate service charge to fund the public realm aspects. But there could be many fewer dwellings, contributing less than this, if proper account were taken of using volunteer gardeners, surpluses from events, and voluntary public donations (compare with quantum of such funds collected by Clifton Suspension Bridge). The idea of the Clifton Conservation Hub is extremely welcome and could be very successful as well as a source of funding for the public realm. I ask the planners to take full account of the risk of blowing the whole concept of conservation area status out of the water, yielding an unmanageable precedent not only in Clifton but elsewhere. Among all the public comments I have noted only one recent one in support and as it is anonymous there must be doubt about the weight to give it.</p>	30-Nov-22
343. O	<p>The current design and planning of the proposed development is not congruent with Clifton in design, scale, mass, and form. I utterly object this application.</p>	01-Dec-22



344. O	<p>Comments: I would like to raise three further objections to those already raised:</p> <p><b>Economic Benefits</b> The comment from the Council's Economic Development team - to the effect that "the Economic Benefits Assessment document represents a reasonable estimate of the potential economic benefits of the proposal" - cannot be taken seriously. The document is not balanced and does not follow - as the report claims - HM Treasury Green Book Guidance for reasons I have set out in my previous objection.</p> <p><b>Carbon Factors</b> The Council's Sustainable City team have commented: "As SAP 2012 carbon factors were in use for Part L 2013 at the time of the initial submission, the use of these carbon factors has been continued for the revised statement (rather than Part L 2021). For the purpose of BCS14 calculations we consider this to be acceptable" The same applicant was recently awarded consent on the West car Park site. That application (21/01999/F) was submitted long before this application (22/02737/F). In a September 2022 revision to the Energy and Sustainability Statement accompanying the application 21/01999/F, the applicant's consultants, Hydrock, updated the carbon factors used in the calculation of the residual CO2 savings from the proposal from Pat L 2013 to Part L 2021. the comment from the Sustainable Cities team seems to indicate that the Council would find it acceptable under the newer application to make use of the older carbon factors. The Council's position should be considered in the light of the rather obvious point that it cannot be for the applicant to pick and choose the carbon factors which suit its purpose of seeking to demonstrate compliance with extant policy, still less, for the Council to consent to the wishes of the applicant when it is clear that the basis for the calculation has changed. To put this another way, the Council is sanctioning an approach to the calculation of carbon savings from renewable electricity generation which have not been reflected in the carbon intensity of generation for more than ten years. It is obviously out of date. It is incredibly disappointing to see a Council that has declared a climate emergency seeking to ease the path of an application based on endorsing the use of carbon factors that are completely divorced from prevailing reality. This view is unacceptable and must be changed.</p> <p><b>Affordable Housing</b> As regards affordable housing, the Applicant's Planning Statement (from Savills, October 2022) states: "Application Policy BCS17 state that affordable housing will be required in residential developments of 15 or more dwellings. A minimum of 40% provision is sought in Inner West Bristol, subject to viability, although the Affordable Housing Practice Note (April 2018) allows a 20% provision subject to meeting the required criteria. The tenure, size and type of affordable units will reflect identified needs, site suitability and economic viability". Currently, the Council is likely to exceed targets it set for building new homes, but will fail to meet its target for affordable homes. The approach in the Affordable Housing Practice Note (AHPN) seemed inconsistent with a sincere attempt to deliver the required number of affordable homes. The AHPN does not form part of the statutory development plan. New policies cannot be set out in the Affordable Homes Practice Note, so the Core Strategy policies would remain the locally relevant ones. BCS17 in the Core Strategy states: Affordable housing will be required in residential developments of 15 dwellings or more. The following percentage targets will be sought through negotiation: - 40% in North West, Inner West and Inner East Bristol; - 30% in all other locations It would be extremely difficult, in the circumstances, to argue that 20% affordable homes is the outcome that would have resulted under the extant policy BCS17. If that is not the case, then it would be reasonable to argue that the AHPN had</p>	02-Dec-22
--------	--	-----------

	<p>materially influenced the policy in ways that it cannot do. There is a general understanding (it is a matter of public record) that the applicant seeks to sell the land to generate revenue in support of its objectives. It is not the role of the Council's planning function, or the development control committee, to facilitate the achievement of a higher value for land than might otherwise be the case. In the context, therefore, and recognizing that there is likely to be sufficient residual value in the land value to justify a higher proportion of affordable homes, then if consent were given to the proposal, it would be difficult to argue that the AHPN had not given rise to a material change in the application of the extant policy on affordable homes, BCS17. The 20% affordable homes offered by the applicant a) is inadequate, and b) has been arrived at in a manner that is inconsistent with the application of BCS17.</p>	
--	---	--

345. O	<p>The Planning Statement from Savills makes much of the context in which the application is made, in particular, the situation that Bristol, Clifton &amp; West of England Zoological Society (BCWEZS) finds itself in. It also makes much of the economic impacts, as well as the supposedly sustainable nature of the proposal. Background The economic plight of the Zoological Gardens site is significantly of BCWEZS's own making. The publicly available Annual Report and Financial Statements for BCWEZS, made up for the year ending December 2019, reported on the 2020-2025 Strategic Plan. Included in the Plan were: - "Capital investment at both Bristol Zoo gardens and Wild Place Project"; and - "...a clear long-term vision and masterplans for both Bristol Zoo Gardens and Wild Place Project. Bristol Zoo Gardens transformed by the time of its bicentenary in 2036. Wild Place will continue to grow into an even greater wildlife adventure, while Bristol Zoo gardens will place a greater value on visitors' interactions with and understanding of individual animals. The Report and Financial Statements in the same document then reported that the closure of both sites as a result of the coronavirus pandemic was impacting on this strategy. It noted: Following the Coronavirus pandemic and the financial implications arising from the closure of both sites from 21 March to 19 June 2020 for Wild Place Project and 14 July for Bristol Zoo gardens, the Trustees will be reconsidering this strategy and the Society's ability to raise the capital needed to implement the planned major capital development projects. .... It will take time for the longer term implications for the Society to be more fully understood and the impact on its future longer term strategy. This will be the main objective for 2020 alongside the continued focus on ensuring both sites operate safely for our employees, visitors and animals and the implementation of cost saving initiatives. Note the wording here - reconsideration of the strategy was supposedly to follow, and not precede, the pandemic. The reported financial performance for the year was not at all suggestive of impending financial meltdown, though alarm bells were being sounded, as would have been prudent in the circumstances. The Report contains a Report of the Trustees, which was approved by the Board of Trustees, and signed off by its Chair on 24 September 2020. The accounts were signed off by the accountants on the 6th of October by the auditor acting on behalf of BCWEZS. Nonetheless, around two months after the Trustees Report report was signed off, at the end of November 2020, the Zoo reported that it was closing the Clifton site altogether, relocating to the Wild Place Project site in South Gloucestershire. Bristol Post reported: The new Bristol Zoo will offer spacious, modern facilities, significant growth in conservation and education work and a ground-breaking, innovative visitor experience, said a Bristol Zoological Society spokesperson. [...] The plans have been announced after the second lockdown forced Bristol Zoo Gardens and Wild Place Project to close, after months of closure during the peak spring and summer months. Although BCWEZS has been keen to draw links between the closure of the Clifton site and the pandemic, there is more than a suggestion that this has provided a somewhat convenient way for BCWEZS to give a decision that had been considered for some time a softer landing. This is because the visitor numbers at the Zoo site in recent years appear to have been negatively affected by the growth in visitor numbers at Wild Place Project, which BCWEZS also owns. Although what was written in the Annual Report and Financial Statements for the year ending end of 2019 gave no clear hint of this, as the Planning Statement for the West Car Park notes: A formal submission for pre-application request was made to Bristol City Council in March 2020. The proposed development submitted for pre-application</p>	02-Dec-22
--------	---	-----------

comment related to a scheme for 78 dwellings (no affordable housing provision and a proposed density of 153 dph) and the buildings proposed ranged from 2-4.5 storey plus semi basement parking. It is clear, therefore, that well before the Report and Financial Statements for year ending 2019 were signed off, and in advance of the first lock-down linked to the Covid-19 pandemic, BCWEZS was exploring the option of developing the West Car Park. It is not entirely clear, therefore, that plans were not already afoot to sell the Clifton site well before the effects of the pandemic became known. Chris Booy, Vice Chair of Trustees, in his written statement regarding the Zoo's application on the West Car Park, noted: In late 2020, Trustees of Bristol Zoological Society voted unanimously to relocate Bristol Zoo to the Wild Place Project site. [...] This decision followed an extensive process to explore a number of options, as well as taking independent professional advice. It seems clear that preparatory work to inform the decision had been underway for some time. It is a little surprising that the Trustees Report remained silent regarding the preparatory work ongoing, including the pre-application submission to Bristol City Council. The Charity Commission's Guidance on preparing a trustees' annual report indicates: If your charity's income is more than £500,000 you also need to: - explain your strategy for meeting its charitable purposes - list any significant activities you undertook as part of this strategy - give details of what your charity achieved in carrying out these activities to meet its purposes The omission, in the Report, of any mention of the pre-application submission, or other work underway at the time, is an omission in the Trustees' explanation of their Strategy. In a video purporting to explain its decision, the CEO, Justin Morris, reports that there has been a 'significant decline over many years' in visitor numbers. The evolution in visitor numbers at the Clifton site has, between 2008 and 2019 (we have excepted the 2020 year for fairly obvious reasons) exhibited a downward trend overall. This is true for both total visitor numbers and paying visitors. The former exhibits a compound rate of decline of less than 1% per annum, the latter, a slightly higher compound rate of 1.4% (see Figure 1). Figure 1: Evolution of Visitor Numbers over Time, 2008-2019, Zoo Gardens Site Source: all data are from previous versions of the BCWEZS Annual Report and Financial Statements Neither of these rates seems 'precipitous', though equally, that they were happening would have been risen to consider additional forms of income generation and / or a change in the nature of the visitor experience, as mentioned in the Report and Financial Statements. The picture is rather different, though, if one looks only at the period before the Wild Place Project was up and running. In the period from 2008-2013 (2014 was the first full year where WPP was in operation), there is no obvious downward trend in visitor numbers at all (see Figure 2). There is no clear increase either (there is, possibly, for the paying visitors). Figure 2: Evolution of Visitor Numbers over Time, 2008-2013, Zoo Gardens Site Source: all data are from previous versions of the BCWEZS Annual Report and Financial Statements The main period of decline in visitor numbers at the Clifton site coincides with the opening of WPP, and the increasing number of visitors choosing to visit there over time. This must have been foreseeable: a competing (even if run by the same entity) attraction of a similar nature to an existing one would be expected to draw some visitors away from the existing attraction. Indeed, as WPP visitors have steadily increased, it might be considered somewhat surprising that visitor numbers at the Clifton site held up as well as they did (see Figure 3). Figure 3: Evolution of Visitor Numbers over Time, 2008-2019, Zoo Gardens Site and WPP Source: all data are from previous

	<p>versions of the BCWEZS Annual Report and Financial Statements If BCWEZS wanted to maintain visitors at the Clifton site, establishing a competing attraction was a strange way of seeking to achieve that. Since 2013, total visitor numbers at the Zoo site have held up rather better than the number of paying visitors at the Clifton site: whilst the former have declined by 1.3%p.a. in the period up to, and including, 2019, the latter have fallen by 2.6% p.a. over the same period. In Chris Booy's statement referenced above, he noted that the decision was linked to operating losses in recent years, coinciding with the opening of WPP: The decision to relocate after 185 years of memories was not taken lightly, but after making an operating loss in four of the last six years, we had to move forward to safeguard the future of the Society. It might be considered, therefore, that decisions of the Zoological Society's own making have been at least partially responsible for its worsening financial performance. There was also a statement made to the effect that the relocation to WPP would enable 'millions more people to enjoy the magic'. The 2035 vision for the zoo sets out a target regarding visitors. By 2035, the aim is to: 'Engage and connect with more than 800,000 visitors and members per annum.' In 2019, across the Clifton site and WPP, there were 830,000 visitors (see Figure 3), or more than the target for WPP to achieve by 2035. The implication is that by 2035, the main effect of a strategy that achieves the 800,000 targets will have been a net transfer of the half a million or so visitors at the Clifton site to WPP. The potential environmental consequences of each scenario are explored below. The suggestion that the new zoo site will have, in the words of the Chair of the Trustees, Charlotte Moar, 'conservation and sustainability at its heart' is questionable. Indeed, BCWEZS's strategy looks like the antithesis of what an entity concerned with wildlife would do, recognizing that - as BCWEZS well knows - one of the major threats (if not the major threat) to species extinction comes from climate change (see below). Although this preamble may seem of limited relevance, it does need to be recognized that Development Management Policy DM31 (see further below) requires that: Where a proposal would affect the significance of a heritage asset, including a locally listed heritage asset, or its wider historic setting, the applicant will be expected to: i. Demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; Given that BCWEZS's decision have been responsible for the drop off in visitor numbers at the Clifton site, then it might have been expected to take 'all reasonable efforts' to sustain the existing use (including, presumably, by closing WPP, or by rationalizing the use of each site according to suitability for key species). The application has not demonstrated that this has been done.</p> <p>Economic Benefits If applicants make claims for their proposal that are obviously unfounded, it is important that these are highlighted. The report by Savills - 'Economic Benefits Assessment' - is blatantly lopsided as an exercise in economic assessment, whilst also being riddled with errors and judgements of a questionable nature. Officers and Councillors are at risk of being seriously misled by this report. The report claims that: The assessment of economic benefits follows guidance from the Homes and Communities Agency Additionality Guide (HCA, 2014) and HM Treasury's Green Book (2020). This report does not, though, follow the HM Treasury's Green Book: if it can be said to have done so, it does so selectively and in a uniquely biased manner. The Treasury's Green Book would have required external costs and benefits to have been included in any assessment. These are genuinely public costs and benefits</p>	
--	---	--

	<p>and might have a central role in determining whether the harm to heritage assets is justified. Because no attempt has been made to identify any external costs (because the assessment fails to respect the guidance it claims to have followed), it could not reliably be determined whether the harm to heritage assets was justified. Without a proper appraisal of these matters, attaching monetary values as per the HM Treasury Green Book Guidance (including Supplementary Guidance), the Council cannot possibly determine whether the harm to heritage assets is justified. Nonetheless, we should explore the claims made further. The assessment suggests the reference case for the assessment is as follows: The reference case for this assessment is the site in a vacant state once the Bristol Zoo moves to its new home. We can compare this with the words in the Addendum to the Transport Statement from Peter Evans Partnership related to the same application: Bristol Zoo Gardens closed to members of the public in September 2022, after the submission of the planning application. However the zoo use remains the permitted use for the site. Therefore consideration of this use and the associated traffic generation in the baseline position as set out in the Transport Statement for the scheme remains appropriate. The Planning Statement sets out a range of benefits which are attributed to the application. 5.75. What is abundantly clear is that, while the nature of the movements may be different as the site moves from being a tourist attraction to a residential/community use, overall there will be a significant reduction in movements associated with the proposals (DM23 states that development should not give rise to unacceptable traffic conditions). 5.76. It is also relevant to note that it is understood that in excess of 85.5% of visitors to the zoo currently travel by private motor car, while the application proposals not only seek to reduce total movements, but also to encourage alternative modes of transport. [...] 5.82. Residents will not be eligible for residents parking permits and so, in comparison with the existing tourist use where there would be significant use of the pay and display on-street parking, it is anticipated that there will be a significant reduction in parking demand on surrounding streets. It is clear from the above that all the transport impacts are assessed against a baseline of the Zoo operating as an open visitor attraction, whilst the economic assessment assumes a baseline where the site is vacant. If the site was to be treated as an operating visitor attraction for the purposes of assessing transport impacts, why would the economic assessment take a completely different baseline as the basis for the assessment? It doesn't really matter which one believes is more relevant - given the site is, de facto, not open for business, then it seems difficult to sustain the fiction that it is still occupied. Either the claimed transport benefits are not as they are, or the claimed economic benefits are not as they are. The applicant is guilty of choosing multiple different baselines to suit whatever case it is seeking to make in a given document. A clear view is required on how assessment should proceed. Is it the Transport Statement or the Economic Assessment which is wrong? The approach to appraising the impact of the proposal is clearly not consistent across the application. Claimed Additional Homes The social and economic benefits of the site include a suggestion that the 196 additional homes are to be included as a social and economic benefit. There are relevant questions to be considered as to whether these homes are genuinely 'additional'. The Planning Statement is clear enough on the need for new dwellings due to a 'shortfall': BCC published its Five Year Housing Land Supply Assessment 2020 to 2025 in June 2021, which confirms that the Council cannot demonstrate a five year supply of deliverable housing</p>	
--	--	--

	<p>sites. It confirms that the council only has a 3.7 years supply of housing land. The statement also confirmed that BCC is failing to deliver sufficient homes against the Housing Delivery Test, at 72% of the delivery requirement. The administrative area of Bristol is, therefore, in need of significant new residential dwellings to address the shortfall. The claim that the homes which are proposed will be additional raises questions regarding the counterfactual. If there is a shortfall against existing policy requirements, then it becomes more difficult to argue the 'additionality' case. Can it be argued that these houses are additional to what would otherwise be supplied when a) there is a shortfall against targets, and b) where growth in construction activity is limited by a shortage in availability of labour? If the homes were not developed here, the shortfall might, after all, equally be met elsewhere, though ultimately, the pace of delivery of dwellings may be constrained by the availability of suitably skilled labour. Employment Claims In respect of employment, the Assessment claims: The proposed development would generate more jobs, economic activity and revenues to the local government than the reference case which is the vacant site once the Bristol Zoo moves to its new home. The economic benefits include 125 on and off-site construction jobs during the 3-year construction period for residents of Bristol; 54 on-site jobs during operation (including people working from their home). Proposals such as this will not generate new 'jobs' in construction. The employment market across the UK is currently tight, and it is especially tight in construction. The Construction Skills Network suggests that there will be an additional quarter of a million workers required between now and 2026 (it is not entirely clear where they are expected to come from). The likely impact of this proposal is to contribute to overall construction activity, the pace of delivery of which may be constrained by the availability of sufficient workers with the relevant skills. The net effect of the proposal is likely to be, at the margin, to slow down the pace of delivery of everything else. The figures for the on-site jobs are even less defensible than those for the construction sector. The Assessment states: Once operational, the proposed development could generate up to 54 on-site full time equivalent (FTE) jobs upon completion based on the employment densities for each use class within the proposed development, including 41 homeworkers.<sup>5</sup> The estimate for the numbers of homeworkers who will reside on-site is based on the ONS estimates of homeworkers as a percentage of working age residents in the South West<sup>6</sup> and applying that on the household level. What this is identifying is - based on ONS estimates - how many of the residents at the site might be home workers. In order for it to be correct to claim the site might 'generate' these homeworking jobs, it would also have to generate the people. These are people who do not spontaneously emerge once the site is built: they do already exist. Nor does the development spontaneously create (anywhere) opportunities for homeworkers at the site. To attribute these jobs to the site is not credible. There may be some employment attributable to the development in terms of staff at the café, office and community hub, but one also needs to consider the relevant counterfactual. There might be some additional spend (relative to what would have occurred anyway) but much (not all) of it is likely to be 'displacement' of spend that would have occurred elsewhere. All this assumes that the appropriate counterfactual is a vacant site - if one took the view adopted in the Transport Assessment - that the baseline is a still functioning Zoo, then even on the methodologically flawed grounds that the employment claims are made, the change at the site would look very different. In summary, the claimed</p>	
--	---	--

	<p>employment generation is unsound. New Expenditure Similar comments can be made regarding 'new expenditure' by residents. The assessment makes the following assumptions: To estimate the additional expenditure from new residents, we take the average household expenditure for convenience goods, comparison goods and food and beverages as detailed in Table 2.6. We multiply the expenditure by the respective retention rates to estimate how much of this expenditure is retained in Bristol City's retail and restaurant units. We then multiply the result by the 196 additional households in the proposed development. This calculation gives an estimate of the weekly residential expenditure which is then multiplied by 52 to estimate the yearly expenditure. We estimate that the expenditure that would be retained in the local authority area to be approximately £1.5m per annum. The residents will not be 'new people' (other than any new-born children). They already exist somewhere, and they spend money. Correctly considered, the expenditure is likely to imply displacement of expenditure that would have occurred elsewhere (unless the occupants already live nearby, in which case, their expenditure patterns may be similar). It would be difficult to justify, however, attributing any additionality to this spend. Some incremental uplift might be attributable to the café simply because of its proximity to residents. This assumes, of course, that the appropriate counterfactual is a vacant site - if one took the view adopted in the Transport Assessment - that the baseline is a still functioning Zoo, then even on the methodologically flawed grounds that the 'spend' claims are made, the change at the site would look very different. The Assessment goes even further than this: 2.5.3. This additional expenditure is expected to support additional jobs in retail and food and beverage. Using average turnover per employee in these sectors we estimate that this will support 13 jobs for residents of Bristol, which are accounted for in the multiplier effect outlined in Table 2.5 above.</p> <p>2.5.4. Additionally, expenditure from new residents living at the Proposed Development would support employment in local shops and businesses in Bristol City. Again, it is very difficult to justify a view that the jobs supported would be 'additional'. The point at para 2.5.4. seems to be double counting the effect described in 2.5.3., which itself is not genuinely additional. GVA The Gross Value Added (GVA) calculations are effectively run off the employment assumptions discussed above: Gross Value Added (GVA) is an indicator of wealth creation by measuring economic activity associated with the operations in the development proposal. This section outlines the estimated GVA benefits which would be generated compared to the reference case. We have based our estimates based on GVA generated per worker in the South West region<sup>7</sup> and the number of operational jobs created by each use type presented in Table 2.3. The proposed development scheme is estimated to generate £1.6m per annum. Given the questionable basis for the employment figures claimed in the report, then it follows that the claimed GVA figures are also unsound. There are other reasons, though, why the GVA figures are unlikely to be attributable to this site. This may seem counter-intuitive, but it comes back to the question of the relevant counterfactual: if this scheme were not given the go-ahead, would the same level of GVA be generated from construction across the year? If the labour market were not so constrained, then it might be possible to claim the GVA as 'additional', especially in conditions where the consenting process for housing was such that rates of build were in excess of what was required by Government (there was clear scope to argue that the development was 'additional', in the sense of being above levels required by Government policy). Neither is true in</p>	
--	--	--



	<p>this case. Construction-related GVA will not be affected by what in the UK context is a relatively small scheme. Tax Revenues as Economic Benefits The Savills Assessment goes on to describe how the proposals could lead to the generation of additional public sector revenue. It is rather odd to see taxes and other transfers included as 'economic benefits'. Council Tax revenue is not 'an economic benefit': it arises as a transfer of income from private households to the Council. The same is true of Business Rates, except that the entity paying is a business, transferring funds to (at least for the majority of them) Bristol City Council. The payment of CIL is also a transfer. The New Homes Bonus is a transfer of funds from central government to local government. Where do Savills imagine the New Homes Bonus payments come from? Does the revenue materialize from thin air? HM Treasury's Green Book notes: 6.7 Transfers of resources between people (e.g. gifts, taxes, grants, subsidies or social security payments) should be excluded from the overall estimate of Net Present Social Value (NPSV). Transfers pass purchasing power from one person to another and do not involve the consumption of resources. Transfers benefit the recipient and are a cost to the donor and therefore do not make society as a whole better or worse off. Only under quite specific circumstances should taxes be included as a benefit. The Assessment makes no such case. It presents all forms of what are, for the most part, forms of charge or tax as 'economic benefits'. Understanding the economic consequences of these transfers would require additional analysis of, for example, the deadweight loss implied by the imposition of the relevant taxes / charges. In reality, the extraordinarily marginal nature of these in the macroeconomic context is such that they would not tend to have any meaningful impact on the framework of taxation and spending that government would implement as a means to achieve its overarching fiscal objectives.</p> <p>Summary There is little in the Assessment of Economic Benefits that stands up to close scrutiny. The Assessment is lopsided in the extreme. It fails to follow Green Book principles in that none of the externalities associated with building out the proposal are considered. There may also be affects on asset values for neighbours that the assessment overlooks. These would not be public disbenefits, but private ones. Nonetheless, they are a reflection of the affect of the site on the amenity of the existing property owners. Transport First of all, it seems clear that - as per the above - the baseline for the Transport Assessment is no longer the relevant one. It is not clear what the BCWEZS would do in the absence of the application being granted consent but given that there appears to be no 'Plan B', then it would be strange to assume that the baseline for the assessment is a state of affairs which no longer prevails. The attempt, in the Addendum to the Transport Statement, to reassert that the appropriate baseline for the assessment is 'the zoo use' because this 'remains the permitted use for the site' belongs in the realms of magic realism. If BCWEZS has based its strategy on a presumption that one or other, or both, planning consents would be granted (irrespective of the nature of the application made), then to the reasons for presuming such an outcome deserve scrutiny, especially if they effectively imply a fettering of the discretion of officers and Councillors to arrive at a rational decision, achieved in a lawful manner. Nonetheless, the claims in the original assessment that, for example, the design of the scheme reflects an assessment that 'in this location it would not be necessary to own a car' and that the scheme provides 'infrastructure and promotion measures ... to encourage non private car travel' cannot be taken seriously: there are 118 car parking spaces proposed. As regards collectively owned vehicles, the Transport</p>	
--	---	--

	<p>Statement notes: 'A car club space and car is proposed as part of the scheme.' That is suggestive of a scheme that does only the bare minimum. The supposed benefits of this car club space are overblown: Whilst provision of a car club vehicle still enables car travel the availability of this vehicle would reduce the need for residents to own their own private car, which in turn is a sustainable benefit to the scheme. This is also a benefit to the wider Clifton area as would enable local residents to use the shared vehicle instead of owning their own car. The aim for this vehicle to be electric brings environmental benefits. In other words, it's not even guaranteed to have the car as electric. The Planning Statement from Savills notes: 5.75. What is abundantly clear is that, while the nature of the movements may be different as the site moves from being a tourist attraction to a residential/community use, overall there will be a significant reduction in movements associated with the proposals (DM23 states that development should not give rise to unacceptable traffic conditions). 5.76. It is also relevant to note that it is understood that in excess of 85.5% of visitors to the zoo currently travel by private motor car, while the application proposals not only seek to reduce total movements, but also to encourage alternative modes of transport. [...] 5.82. Residents will not be eligible for residents parking permits and so, in comparison with the existing tourist use where there would be significant use of the pay and display on-street parking, it is anticipated that there will be a significant reduction in parking demand on surrounding streets. One could be forgiven for thinking that the two consultants' reports are discussing a completely different scheme, other than in the respect that they both assume - erroneously - that the effect of the proposal on traffic should be considered as if the Zoo was still open. The applicants may pretend all they wish that the Zoo hasn't closed, but it already has, and that decision was of the applicant's own making. The appropriate baseline for this assessment is a non-functioning Zoo, with no visitors, and no visitor traffic, not a state of affairs that has now passed, and for which there are - apparently - no clear plans to return to. But why, if the location is so 'sustainable' (what does it even mean for 'a location' to be 'sustainable?'), were 'in excess of 85.5% of visitors' to the Zoo, when it was still open, travelling by car? Why does the Transport Assessment assume that the behaviour of the would-be residents will be so different in the face of similar travel options? The reality is that the Transport Statement does not really envisage car-free travel, and is not expecting much by way of this in future. Indeed, notwithstanding the 118 car parking spaces, the Transport Assessment is happy to consider the potential for this number being exceeded. It includes a thoroughly unconvincing plan for what it appears to anticipate will be pressure for additional car parking: However BCC confirmed early in the pre-application process that residents of the BZG site would not be able to apply for on-street parking permits. This removes the potential impact of overspill parking from occurring on a daily basis, as pay and display parking locally is time limited. Therefore when residents move into the site they would be aware of whether they have space to park a vehicle or not. The level of car parking proposed is therefore designed on this basis. MfS [Manual for Streets] identifies at section 8 that lower car parking provision can be successful when adequate on-street parking controls are present, which is the case at the BZG site. Ineligibility for on-street parking permits would be made clear though any sales and marketing agent. With allocated car parking proposed this provides residents with a clear understanding as to whether their property is car free or not. The internal streets around the site would be managed by a management company to make</p>	
--	---	--

	<p>sure that no parking takes place outside of the marked parking bays. The presumption is that there would be controls feeding into habits, but as the above extracts indicate, parking restrictions locally are time-limited. Those using cars for travel into work would, therefore, compete for spaces outside the hours of time-restricted parking. Since the Statement mainly considers impacts relative to 'peak time' traffic, it is unclear whether the Statement has properly considered the possibility that would-be residents may simply take a chance on out-of-restricted hours spaces being available. Contrary to what is stated, therefore, it seems likely that there could be intense competition for local parking spaces in the hours outside the restrictions - the exact same hours when visitors to the Zoo would not have been seeking to park their vehicles. All o</p>	
346. O		02-Dec-22

347. O	<p>I find it difficult to believe that this application is considered to be complete given the lack of evidence on, notably, the environment / energy side. I have made these views known to relevant officers, but in the absence of a response to most recent questions, I note the following: The absence of an integration of a commitment to reduce embodied carbon in the design (both in terms of materials and the completely inappropriate scale) is not aligned with National planning Policy Framework, notably para 134 and the associated Guidelines. It is inconsistent with even the existing Net Zero Strategy, and not in line with stated policy in this respect. The Council has the ability through existing policies, notably BCS13, BCS14 and BCS15, to reflect the requirements of the NPPF in respect of design quality in its decisions. Given that the design fails in respect of embodied carbon / energy, then it should be refused. In respect of other matters, the 'Economic Benefits' assessment is completely lopsided. It claims to follow guidance on additionality from the now abolished HCA, making highly subjective decisions regarding the magnitude of these benefits. It also claims to follow guidance on appraisal from the Treasury Green Book. If it does so at all, it does so only in the most impartial and lopsided manner. No professional economist ought to render such a document on the basis that it captures the economic benefits. It is of concern that the comment from 'economic development' simply asks for further elaboration of these benefits without highlighting any of the very obvious deficiencies and shortcomings of the presentation. Whether or not the document concerned should carry any weight at all in a development control decision is moot, in any case, yet since the Committee and officers have tended to reference these in decision making, possibly considering this (rightly or wrongly) as part of the balance they must weigh up, then it seems entirely appropriate to indicate that the benefits assessment is, literally, Cyclopic in its outlook, focusing only on 'positive' benefits without weighing up - as per Treasury Green Book - the wider impacts of the development. These include, but are not limited to, environmental impacts, none of which have been considered in the assessment of benefits. In the expectation of further information and revision, these comments are not as detailed as they will be on receipt of a revised proposal.</p>	02-Dec-22
--------	---	-----------

348. O	<p>Comments: I would like to raise three further objections to those already raised:</p> <p><b>Economic Benefits</b> The comment from the Council's Economic Development team - to the effect that "the Economic Benefits Assessment document represents a reasonable estimate of the potential economic benefits of the proposal" - cannot be taken seriously. The document is not balanced and does not follow - as the report claims - HM Treasury Green Book Guidance for reasons I have set out in my previous objection.</p> <p><b>Carbon Factors</b> The Council's Sustainable City team have commented: "As SAP 2012 carbon factors were in use for Part L 2013 at the time of the initial submission, the use of these carbon factors has been continued for the revised statement (rather than Part L 2021). For the purpose of BCS14 calculations we consider this to be acceptable" The same applicant was recently awarded consent on the West car Park site. That application (21/01999/F) was submitted long before this application (22/02737/F). In a September 2022 revision to the Energy and Sustainability Statement accompanying the application 21/01999/F, the applicant's consultants, Hydrock, updated the carbon factors used in the calculation of the residual CO2 savings from the proposal from Pat L 2013 to Part L 2021. the comment from the Sustainable Cities team seems to indicate that the Council would find it acceptable under the newer application to make use of the older carbon factors. The Council's position should be considered in the light of the rather obvious point that it cannot be for the applicant to pick and choose the carbon factors which suit its purpose of seeking to demonstrate compliance with extant policy, still less, for the Council to consent to the wishes of the applicant when it is clear that the basis for the calculation has changed. To put this another way, the Council is sanctioning an approach to the calculation of carbon savings from renewable electricity generation which have not been reflected in the carbon intensity of generation for more than ten years. It is obviously out of date. It is incredibly disappointing to see a Council that has declared a climate emergency seeking to ease the path of an application based on endorsing the use of carbon factors that are completely divorced from prevailing reality. This view is unacceptable and must be changed.</p> <p><b>Affordable Housing</b> As regards affordable housing, the Applicant's Planning Statement (from Savills, October 2022) states: "Application Policy BCS17 state that affordable housing will be required in residential developments of 15 or more dwellings. A minimum of 40% provision is sought in Inner West Bristol, subject to viability, although the Affordable Housing Practice Note (April 2018) allows a 20% provision subject to meeting the required criteria. The tenure, size and type of affordable units will reflect identified needs, site suitability and economic viability". Currently, the Council is likely to exceed targets it set for building new homes, but will fail to meet its target for affordable homes. The approach in the Affordable Housing Practice Note (AHPN) seemed inconsistent with a sincere attempt to deliver the required number of affordable homes. The AHPN does not form part of the statutory development plan. New policies cannot be set out in the Affordable Homes Practice Note, so the Core Strategy policies would remain the locally relevant ones. BCS17 in the Core Strategy states: Affordable housing will be required in residential developments of 15 dwellings or more. The following percentage targets will be sought through negotiation: - 40% in North West, Inner West and Inner East Bristol; - 30% in all other locations It would be extremely difficult, in the circumstances, to argue that 20% affordable homes is the outcome that would have resulted under the extant policy BCS17. If that is not the case, then it would be reasonable to argue that the AHPN had</p>	02-Dec-22
--------	--	-----------

	<p>materially influenced the policy in ways that it cannot do. There is a general understanding (it is a matter of public record) that the applicant seeks to sell the land to generate revenue in support of its objectives. It is not the role of the Council's planning function, or the development control committee, to facilitate the achievement of a higher value for land than might otherwise be the case. In the context, therefore, and recognizing that there is likely to be sufficient residual value in the land value to justify a higher proportion of affordable homes, then if consent were given to the proposal, it would be difficult to argue that the AHPN had not given rise to a material change in the application of the extant policy on affordable homes, BCS17. The 20% affordable homes offered by the applicant a) is inadequate, and b) has been arrived at in a manner that is inconsistent with the application of BCS17.</p>	
--	---	--

349. O	<p>The Planning Statement from Savills makes much of the context in which the application is made, in particular, the situation that Bristol, Clifton &amp; West of England Zoological Society (BCWEZS) finds itself in. It also makes much of the economic impacts, as well as the supposedly sustainable nature of the proposal. Background The economic plight of the Zoological Gardens site is significantly of BCWEZS's own making. The publicly available Annual Report and Financial Statements for BCWEZS, made up for the year ending December 2019, reported on the 2020-2025 Strategic Plan. Included in the Plan were: - "Capital investment at both Bristol Zoo gardens and Wild Place Project"; and - "...a clear long-term vision and masterplans for both Bristol Zoo Gardens and Wild Place Project. Bristol Zoo Gardens transformed by the time of its bicentenary in 2036. Wild Place will continue to grow into an even greater wildlife adventure, while Bristol Zoo gardens will place a greater value on visitors' interactions with and understanding of individual animals. The Report and Financial Statements in the same document then reported that the closure of both sites as a result of the coronavirus pandemic was impacting on this strategy. It noted: Following the Coronavirus pandemic and the financial implications arising from the closure of both sites from 21 March to 19 June 2020 for Wild Place Project and 14 July for Bristol Zoo gardens, the Trustees will be reconsidering this strategy and the Society's ability to raise the capital needed to implement the planned major capital development projects. .... It will take time for the longer term implications for the Society to be more fully understood and the impact on its future longer term strategy. This will be the main objective for 2020 alongside the continued focus on ensuring both sites operate safely for our employees, visitors and animals and the implementation of cost saving initiatives. Note the wording here - reconsideration of the strategy was supposedly to follow, and not precede, the pandemic. The reported financial performance for the year was not at all suggestive of impending financial meltdown, though alarm bells were being sounded, as would have been prudent in the circumstances. The Report contains a Report of the Trustees, which was approved by the Board of Trustees, and signed off by its Chair on 24 September 2020. The accounts were signed off by the accountants on the 6th of October by the auditor acting on behalf of BCWEZS. Nonetheless, around two months after the Trustees Report report was signed off, at the end of November 2020, the Zoo reported that it was closing the Clifton site altogether, relocating to the Wild Place Project site in South Gloucestershire. Bristol Post reported: The new Bristol Zoo will offer spacious, modern facilities, significant growth in conservation and education work and a ground-breaking, innovative visitor experience, said a Bristol Zoological Society spokesperson. [...] The plans have been announced after the second lockdown forced Bristol Zoo Gardens and Wild Place Project to close, after months of closure during the peak spring and summer months. Although BCWEZS has been keen to draw links between the closure of the Clifton site and the pandemic, there is more than a suggestion that this has provided a somewhat convenient way for BCWEZS to give a decision that had been considered for some time a softer landing. This is because the visitor numbers at the Zoo site in recent years appear to have been negatively affected by the growth in visitor numbers at Wild Place Project, which BCWEZS also owns. Although what was written in the Annual Report and Financial Statements for the year ending end of 2019 gave no clear hint of this, as the Planning Statement for the West Car Park notes: A formal submission for pre-application request was made to Bristol City Council in March 2020. The proposed development submitted for pre-application</p>	02-Dec-22
--------	---	-----------

comment related to a scheme for 78 dwellings (no affordable housing provision and a proposed density of 153 dph) and the buildings proposed ranged from 2-4.5 storey plus semi basement parking. It is clear, therefore, that well before the Report and Financial Statements for year ending 2019 were signed off, and in advance of the first lock-down linked to the Covid-19 pandemic, BCWEZS was exploring the option of developing the West Car Park. It is not entirely clear, therefore, that plans were not already afoot to sell the Clifton site well before the effects of the pandemic became known. Chris Booy, Vice Chair of Trustees, in his written statement regarding the Zoo's application on the West Car Park, noted: In late 2020, Trustees of Bristol Zoological Society voted unanimously to relocate Bristol Zoo to the Wild Place Project site. [...] This decision followed an extensive process to explore a number of options, as well as taking independent professional advice. It seems clear that preparatory work to inform the decision had been underway for some time. It is a little surprising that the Trustees Report remained silent regarding the preparatory work ongoing, including the pre-application submission to Bristol City Council. The Charity Commission's Guidance on preparing a trustees' annual report indicates: If your charity's income is more than £500,000 you also need to: - explain your strategy for meeting its charitable purposes - list any significant activities you undertook as part of this strategy - give details of what your charity achieved in carrying out these activities to meet its purposes The omission, in the Report, of any mention of the pre-application submission, or other work underway at the time, is an omission in the Trustees' explanation of their Strategy. In a video purporting to explain its decision, the CEO, Justin Morris, reports that there has been a 'significant decline over many years' in visitor numbers. The evolution in visitor numbers at the Clifton site has, between 2008 and 2019 (we have excepted the 2020 year for fairly obvious reasons) exhibited a downward trend overall. This is true for both total visitor numbers and paying visitors. The former exhibits a compound rate of decline of less than 1% per annum, the latter, a slightly higher compound rate of 1.4% (see Figure 1). Figure 1: Evolution of Visitor Numbers over Time, 2008-2019, Zoo Gardens Site Source: all data are from previous versions of the BCWEZS Annual Report and Financial Statements Neither of these rates seems 'precipitous', though equally, that they were happening would have been risen to consider additional forms of income generation and / or a change in the nature of the visitor experience, as mentioned in the Report and Financial Statements. The picture is rather different, though, if one looks only at the period before the Wild Place Project was up and running. In the period from 2008-2013 (2014 was the first full year where WPP was in operation), there is no obvious downward trend in visitor numbers at all (see Figure 2). There is no clear increase either (there is, possibly, for the paying visitors). Figure 2: Evolution of Visitor Numbers over Time, 2008-2013, Zoo Gardens Site Source: all data are from previous versions of the BCWEZS Annual Report and Financial Statements The main period of decline in visitor numbers at the Clifton site coincides with the opening of WPP, and the increasing number of visitors choosing to visit there over time. This must have been foreseeable: a competing (even if run by the same entity) attraction of a similar nature to an existing one would be expected to draw some visitors away from the existing attraction. Indeed, as WPP visitors have steadily increased, it might be considered somewhat surprising that visitor numbers at the Clifton site held up as well as they did (see Figure 3). Figure 3: Evolution of Visitor Numbers over Time, 2008-2019, Zoo Gardens Site and WPP Source: all data are from previous



	<p>versions of the BCWEZS Annual Report and Financial Statements. If BCWEZS wanted to maintain visitors at the Clifton site, establishing a competing attraction was a strange way of seeking to achieve that. Since 2013, total visitor numbers at the Zoo site have held up rather better than the number of paying visitors at the Clifton site: whilst the former have declined by 1.3%p.a. in the period up to, and including, 2019, the latter have fallen by 2.6% p.a. over the same period. In Chris Booy's statement referenced above, he noted that the decision was linked to operating losses in recent years, coinciding with the opening of WPP: The decision to relocate after 185 years of memories was not taken lightly, but after making an operating loss in four of the last six years, we had to move forward to safeguard the future of the Society. It might be considered, therefore, that decisions of the Zoological Society's own making have been at least partially responsible for its worsening financial performance. There was also a statement made to the effect that the relocation to WPP would enable 'millions more people to enjoy the magic'. The 2035 vision for the zoo sets out a target regarding visitors. By 2035, the aim is to: 'Engage and connect with more than 800,000 visitors and members per annum.' In 2019, across the Clifton site and WPP, there were 830,000 visitors (see Figure 3), or more than the target for WPP to achieve by 2035. The implication is that by 2035, the main effect of a strategy that achieves the 800,000 targets will have been a net transfer of the half a million or so visitors at the Clifton site to WPP. The potential environmental consequences of each scenario are explored below. The suggestion that the new zoo site will have, in the words of the Chair of the Trustees, Charlotte Moar, 'conservation and sustainability at its heart' is questionable. Indeed, BCWEZS's strategy looks like the antithesis of what an entity concerned with wildlife would do, recognizing that - as BCWEZS well knows - one of the major threats (if not the major threat) to species extinction comes from climate change (see below). Although this preamble may seem of limited relevance, it does need to be recognized that Development Management Policy DM31 (see further below) requires that: Where a proposal would affect the significance of a heritage asset, including a locally listed heritage asset, or its wider historic setting, the applicant will be expected to: i. Demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; Given that BCWEZS's decision have been responsible for the drop off in visitor numbers at the Clifton site, then it might have been expected to take 'all reasonable efforts' to sustain the existing use (including, presumably, by closing WPP, or by rationalizing the use of each site according to suitability for key species). The application has not demonstrated that this has been done.</p> <p><b>Economic Benefits</b> If applicants make claims for their proposal that are obviously unfounded, it is important that these are highlighted. The report by Savills - 'Economic Benefits Assessment' - is blatantly lopsided as an exercise in economic assessment, whilst also being riddled with errors and judgements of a questionable nature. Officers and Councillors are at risk of being seriously misled by this report. The report claims that: The assessment of economic benefits follows guidance from the Homes and Communities Agency Additionality Guide (HCA, 2014) and HM Treasury's Green Book (2020). This report does not, though, follow the HM Treasury's Green Book: if it can be said to have done so, it does so selectively and in a uniquely biased manner. The Treasury's Green Book would have required external costs and benefits to have been included in any assessment. These are genuinely public costs and benefits</p>	
--	---	--

	<p>and might have a central role in determining whether the harm to heritage assets is justified. Because no attempt has been made to identify any external costs (because the assessment fails to respect the guidance it claims to have followed), it could not reliably be determined whether the harm to heritage assets was justified. Without a proper appraisal of these matters, attaching monetary values as per the HM Treasury Green Book Guidance (including Supplementary Guidance), the Council cannot possibly determine whether the harm to heritage assets is justified. Nonetheless, we should explore the claims made further. The assessment suggests the reference case for the assessment is as follows: The reference case for this assessment is the site in a vacant state once the Bristol Zoo moves to its new home. We can compare this with the words in the Addendum to the Transport Statement from Peter Evans Partnership related to the same application: Bristol Zoo Gardens closed to members of the public in September 2022, after the submission of the planning application. However the zoo use remains the permitted use for the site. Therefore consideration of this use and the associated traffic generation in the baseline position as set out in the Transport Statement for the scheme remains appropriate. The Planning Statement sets out a range of benefits which are attributed to the application. 5.75. What is abundantly clear is that, while the nature of the movements may be different as the site moves from being a tourist attraction to a residential/community use, overall there will be a significant reduction in movements associated with the proposals (DM23 states that development should not give rise to unacceptable traffic conditions). 5.76. It is also relevant to note that it is understood that in excess of 85.5% of visitors to the zoo currently travel by private motor car, while the application proposals not only seek to reduce total movements, but also to encourage alternative modes of transport. [...] 5.82. Residents will not be eligible for residents parking permits and so, in comparison with the existing tourist use where there would be significant use of the pay and display on-street parking, it is anticipated that there will be a significant reduction in parking demand on surrounding streets. It is clear from the above that all the transport impacts are assessed against a baseline of the Zoo operating as an open visitor attraction, whilst the economic assessment assumes a baseline where the site is vacant. If the site was to be treated as an operating visitor attraction for the purposes of assessing transport impacts, why would the economic assessment take a completely different baseline as the basis for the assessment? It doesn't really matter which one believes is more relevant - given the site is, de facto, not open for business, then it seems difficult to sustain the fiction that it is still occupied. Either the claimed transport benefits are not as they are, or the claimed economic benefits are not as they are. The applicant is guilty of choosing multiple different baselines to suit whatever case it is seeking to make in a given document. A clear view is required on how assessment should proceed. Is it the Transport Statement or the Economic Assessment which is wrong? The approach to appraising the impact of the proposal is clearly not consistent across the application. Claimed Additional Homes The social and economic benefits of the site include a suggestion that the 196 additional homes are to be included as a social and economic benefit. There are relevant questions to be considered as to whether these homes are genuinely 'additional'. The Planning Statement is clear enough on the need for new dwellings due to a 'shortfall': BCC published its Five Year Housing Land Supply Assessment 2020 to 2025 in June 2021, which confirms that the Council cannot demonstrate a five year supply of deliverable housing</p>	
--	--	--

	<p>sites. It confirms that the council only has a 3.7 years supply of housing land. The statement also confirmed that BCC is failing to deliver sufficient homes against the Housing Delivery Test, at 72% of the delivery requirement. The administrative area of Bristol is, therefore, in need of significant new residential dwellings to address the shortfall. The claim that the homes which are proposed will be additional raises questions regarding the counterfactual. If there is a shortfall against existing policy requirements, then it becomes more difficult to argue the 'additionality' case. Can it be argued that these houses are additional to what would otherwise be supplied when a) there is a shortfall against targets, and b) where growth in construction activity is limited by a shortage in availability of labour? If the homes were not developed here, the shortfall might, after all, equally be met elsewhere, though ultimately, the pace of delivery of dwellings may be constrained by the availability of suitably skilled labour. Employment Claims In respect of employment, the Assessment claims: The proposed development would generate more jobs, economic activity and revenues to the local government than the reference case which is the vacant site once the Bristol Zoo moves to its new home. The economic benefits include 125 on and off-site construction jobs during the 3-year construction period for residents of Bristol; 54 on-site jobs during operation (including people working from their home) Proposals such as this will not generate new 'jobs' in construction. The employment market across the UK is currently tight, and it is especially tight in construction. The Construction Skills Network suggests that there will be an additional quarter of a million workers required between now and 2026 (it is not entirely clear where they are expected to come from). The likely impact of this proposal is to contribute to overall construction activity, the pace of delivery of which may be constrained by the availability of sufficient workers with the relevant skills. The net effect of the proposal is likely to be, at the margin, to slow down the pace of delivery of everything else. The figures for the on-site jobs are even less defensible than those for the construction sector. The Assessment states: Once operational, the proposed development could generate up to 54 on-site full time equivalent (FTE) jobs upon completion based on the employment densities for each use class within the proposed development, including 41 homeworkers.<sup>5</sup> The estimate for the numbers of homeworkers who will reside on-site is based on the ONS estimates of homeworkers as a percentage of working age residents in the South West<sup>6</sup> and applying that on the household level. What this is identifying is - based on ONS estimates - how many of the residents at the site might be home workers. In order for it to be correct to claim the site might 'generate' these homeworking jobs, it would also have to generate the people. These are people who do not spontaneously emerge once the site is built: they do already exist. Nor does the development spontaneously create (anywhere) opportunities for homeworkers at the site. To attribute these jobs to the site is not credible. There may be some employment attributable to the development in terms of staff at the café, office and community hub, but one also needs to consider the relevant counterfactual. There might be some additional spend (relative to what would have occurred anyway) but much (not all) of it is likely to be 'displacement' of spend that would have occurred elsewhere. All this assumes that the appropriate counterfactual is a vacant site - if one took the view adopted in the Transport Assessment - that the baseline is a still functioning Zoo, then even on the methodologically flawed grounds that the employment claims are made, the change at the site would look very different. In summary, the claimed</p>	
--	--	--

	<p>employment generation is unsound. New Expenditure Similar comments can be made regarding 'new expenditure' by residents. The assessment makes the following assumptions: To estimate the additional expenditure from new residents, we take the average household expenditure for convenience goods, comparison goods and food and beverages as detailed in Table 2.6. We multiply the expenditure by the respective retention rates to estimate how much of this expenditure is retained in Bristol City's retail and restaurant units. We then multiply the result by the 196 additional households in the proposed development. This calculation gives an estimate of the weekly residential expenditure which is then multiplied by 52 to estimate the yearly expenditure. We estimate that the expenditure that would be retained in the local authority area to be approximately £1.5m per annum. The residents will not be 'new people' (other than any new-born children). They already exist somewhere, and they spend money. Correctly considered, the expenditure is likely to imply displacement of expenditure that would have occurred elsewhere (unless the occupants already live nearby, in which case, their expenditure patterns may be similar). It would be difficult to justify, however, attributing any additionality to this spend. Some incremental uplift might be attributable to the café simply because of its proximity to residents. This assumes, of course, that the appropriate counterfactual is a vacant site - if one took the view adopted in the Transport Assessment - that the baseline is a still functioning Zoo, then even on the methodologically flawed grounds that the 'spend' claims are made, the change at the site would look very different. The Assessment goes even further than this: 2.5.3. This additional expenditure is expected to support additional jobs in retail and food and beverage. Using average turnover per employee in these sectors we estimate that this will support 13 jobs for residents of Bristol, which are accounted for in the multiplier effect outlined in Table 2.5 above.</p> <p>2.5.4. Additionally, expenditure from new residents living at the Proposed Development would support employment in local shops and businesses in Bristol City. Again, it is very difficult to justify a view that the jobs supported would be 'additional'. The point at para 2.5.4. seems to be double counting the effect described in 2.5.3., which itself is not genuinely additional. GVA The Gross Value Added (GVA) calculations are effectively run off the employment assumptions discussed above: Gross Value Added (GVA) is an indicator of wealth creation by measuring economic activity associated with the operations in the development proposal. This section outlines the estimated GVA benefits which would be generated compared to the reference case. We have based our estimates based on GVA generated per worker in the South West region<sup>7</sup> and the number of operational jobs created by each use type presented in Table 2.3. The proposed development scheme is estimated to generate £1.6m per annum. Given the questionable basis for the employment figures claimed in the report, then it follows that the claimed GVA figures are also unsound. There are other reasons, though, why the GVA figures are unlikely to be attributable to this site. This may seem counter-intuitive, but it comes back to the question of the relevant counterfactual: if this scheme were not given the go-ahead, would the same level of GVA be generated from construction across the year? If the labour market were not so constrained, then it might be possible to claim the GVA as 'additional', especially in conditions where the consenting process for housing was such that rates of build were in excess of what was required by Government (there was clear scope to argue that the development was 'additional', in the sense of being above levels required by Government policy). Neither is true in</p>	
--	--	--

	<p>this case. Construction-related GVA will not be affected by what in the UK context is a relatively small scheme. Tax Revenues as Economic Benefits The Savills Assessment goes on to describe how the proposals could lead to the generation of additional public sector revenue. It is rather odd to see taxes and other transfers included as 'economic benefits'. Council Tax revenue is not 'an economic benefit': it arises as a transfer of income from private households to the Council. The same is true of Business Rates, except that the entity paying is a business, transferring funds to (at least for the majority of them) Bristol City Council. The payment of CIL is also a transfer. The New Homes Bonus is a transfer of funds from central government to local government. Where do Savills imagine the New Homes Bonus payments come from? Does the revenue materialize from thin air? HM Treasury's Green Book notes: 6.7 Transfers of resources between people (e.g. gifts, taxes, grants, subsidies or social security payments) should be excluded from the overall estimate of Net Present Social Value (NPSV). Transfers pass purchasing power from one person to another and do not involve the consumption of resources. Transfers benefit the recipient and are a cost to the donor and therefore do not make society as a whole better or worse off. Only under quite specific circumstances should taxes be included as a benefit. The Assessment makes no such case. It presents all forms of what are, for the most part, forms of charge or tax as 'economic benefits'. Understanding the economic consequences of these transfers would require additional analysis of, for example, the deadweight loss implied by the imposition of the relevant taxes / charges. In reality, the extraordinarily marginal nature of these in the macroeconomic context is such that they would not tend to have any meaningful impact on the framework of taxation and spending that government would implement as a means to achieve its overarching fiscal objectives.</p> <p>Summary There is little in the Assessment of Economic Benefits that stands up to close scrutiny. The Assessment is lopsided in the extreme. It fails to follow Green Book principles in that none of the externalities associated with building out the proposal are considered. There may also be affects on asset values for neighbours that the assessment overlooks. These would not be public disbenefits, but private ones. Nonetheless, they are a reflection of the affect of the site on the amenity of the existing property owners. Transport First of all, it seems clear that - as per the above - the baseline for the Transport Assessment is no longer the relevant one. It is not clear what the BCWEZS would do in the absence of the application being granted consent but given that there appears to be no 'Plan B', then it would be strange to assume that the baseline for the assessment is a state of affairs which no longer prevails. The attempt, in the Addendum to the Transport Statement, to reassert that the appropriate baseline for the assessment is 'the zoo use' because this 'remains the permitted use for the site' belongs in the realms of magic realism. If BCWEZS has based its strategy on a presumption that one or other, or both, planning consents would be granted (irrespective of the nature of the application made), then to the reasons for presuming such an outcome deserve scrutiny, especially if they effectively imply a fettering of the discretion of officers and Councillors to arrive at a rational decision, achieved in a lawful manner. Nonetheless, the claims in the original assessment that, for example, the design of the scheme reflects an assessment that 'in this location it would not be necessary to own a car' and that the scheme provides 'infrastructure and promotion measures ... to encourage non private car travel' cannot be taken seriously: there are 118 car parking spaces proposed. As regards collectively owned vehicles, the Transport</p>	
--	---	--

	<p>Statement notes: 'A car club space and car is proposed as part of the scheme.' That is suggestive of a scheme that does only the bare minimum. The supposed benefits of this car club space are overblown: Whilst provision of a car club vehicle still enables car travel the availability of this vehicle would reduce the need for residents to own their own private car, which in turn is a sustainable benefit to the scheme. This is also a benefit to the wider Clifton area as would enable local residents to use the shared vehicle instead of owning their own car. The aim for this vehicle to be electric brings environmental benefits. In other words, it's not even guaranteed to have the car as electric. The Planning Statement from Savills notes: 5.75. What is abundantly clear is that, while the nature of the movements may be different as the site moves from being a tourist attraction to a residential/community use, overall there will be a significant reduction in movements associated with the proposals (DM23 states that development should not give rise to unacceptable traffic conditions). 5.76. It is also relevant to note that it is understood that in excess of 85.5% of visitors to the zoo currently travel by private motor car, while the application proposals not only seek to reduce total movements, but also to encourage alternative modes of transport. [...] 5.82. Residents will not be eligible for residents parking permits and so, in comparison with the existing tourist use where there would be significant use of the pay and display on-street parking, it is anticipated that there will be a significant reduction in parking demand on surrounding streets. One could be forgiven for thinking that the two consultants' reports are discussing a completely different scheme, other than in the respect that they both assume - erroneously - that the effect of the proposal on traffic should be considered as if the Zoo was still open. The applicants may pretend all they wish that the Zoo hasn't closed, but it already has, and that decision was of the applicant's own making. The appropriate baseline for this assessment is a non-functioning Zoo, with no visitors, and no visitor traffic, not a state of affairs that has now passed, and for which there are - apparently - no clear plans to return to. But why, if the location is so 'sustainable' (what does it even mean for 'a location' to be 'sustainable?'), were 'in excess of 85.5% of visitors' to the Zoo, when it was still open, travelling by car? Why does the Transport Assessment assume that the behaviour of the would-be residents will be so different in the face of similar travel options? The reality is that the Transport Statement does not really envisage car-free travel, and is not expecting much by way of this in future. Indeed, notwithstanding the 118 car parking spaces, the Transport Assessment is happy to consider the potential for this number being exceeded. It includes a thoroughly unconvincing plan for what it appears to anticipate will be pressure for additional car parking: However BCC confirmed early in the pre-application process that residents of the BZG site would not be able to apply for on-street parking permits. This removes the potential impact of overspill parking from occurring on a daily basis, as pay and display parking locally is time limited. Therefore when residents move into the site they would be aware of whether they have space to park a vehicle or not. The level of car parking proposed is therefore designed on this basis. MfS [Manual for Streets] identifies at section 8 that lower car parking provision can be successful when adequate on-street parking controls are present, which is the case at the BZG site. Ineligibility for on-street parking permits would be made clear though any sales and marketing agent. With allocated car parking proposed this provides residents with a clear understanding as to whether their property is car free or not. The internal streets around the site would be managed by a management company to make</p>	
--	---	--

	<p>sure that no parking takes place outside of the marked parking bays. The presumption is that there would be controls feeding into habits, but as the above extracts indicate, parking restrictions locally are time-limited. Those using cars for travel into work would, therefore, compete for spaces outside the hours of time-restricted parking. Since the Statement mainly considers impacts relative to 'peak time' traffic, it is unclear whether the Statement has properly considered the possibility that would-be residents may simply take a chance on out-of-restricted hours spaces being available. Contrary to what is stated, therefore, it seems likely that there could be intense competition for local parking spaces in the hours outside the restrictions - the exact same hours when visitors to the Zoo would not have been seeking to park their vehicles. All o</p>	
350. O		02-Dec-22

351. O	<p>I find it difficult to believe that this application is considered to be complete given the lack of evidence on, notably, the environment / energy side. I have made these views known to relevant officers, but in the absence of a response to most recent questions, I note the following: The absence of an integration of a commitment to reduce embodied carbon in the design (both in terms of materials and the completely inappropriate scale) is not aligned with National planning Policy Framework, notably para 134 and the associated Guidelines. It is inconsistent with even the existing Net Zero Strategy, and not in line with stated policy in this respect. The Council has the ability through existing policies, notably BCS13, BCS14 and BCS15, to reflect the requirements of the NPPF in respect of design quality in its decisions. Given that the design fails in respect of embodied carbon / energy, then it should be refused. In respect of other matters, the 'Economic Benefits' assessment is completely lopsided. It claims to follow guidance on additionality from the now abolished HCA, making highly subjective decisions regarding the magnitude of these benefits. It also claims to follow guidance on appraisal from the Treasury Green Book. If it does so at all, it does so only in the most impartial and lopsided manner. No professional economist ought to render such a document on the basis that it captures the economic benefits. It is of concern that the comment from 'economic development' simply asks for further elaboration of these benefits without highlighting any of the very obvious deficiencies and shortcomings of the presentation. Whether or not the document concerned should carry any weight at all in a development control decision is moot, in any case, yet since the Committee and officers have tended to reference these in decision making, possibly considering this (rightly or wrongly) as part of the balance they must weigh up, then it seems entirely appropriate to indicate that the benefits assessment is, literally, Cyclopic in its outlook, focusing only on 'positive' benefits without weighing up - as per Treasury Green Book - the wider impacts of the development. These include, but are not limited to, environmental impacts, none of which have been considered in the assessment of benefits. In the expectation of further information and revision, these comments are not as detailed as they will be on receipt of a revised proposal.</p>	02-Dec-22
--------	---	-----------



352. O	<p>To who it may concern, As a long time resident of the area the Bristol Zoo gardens holds a special place in my heart. I object to the proposed plans for this site on the following grounds: 1. The proposed buildings are far too large and completely out of character with the surrounding area. To solve this please reduce the gargantuan nature of the blocks by splitting them up and reducing their heights to be similar to that of the surrounding buildings. I believe the perimeter faces of the new buildings should be in the Clifton vernacular style to limit the development looking disjointed from the surrounding areas. 2. The amount of destruction to the beautiful gardens and historic trees is far too great. Less large old trees should be cut down and more must be saved for future generations to enjoy. 3. There is no safeguarding that the gardens will remain open to the public in the future. This should be rectified by creating legal documentation denoting how the green spaces will be protected in the future for public use. 4. Much of the development seems to revolve around residents using cars, this is out of line with Bristol's will to go Green (BCAZ). Car parking spaces should be removed (Especially those on the surface.) this will free up more area for the park. Much greater importance and thought must be given on public transport links to the site. The current proposal is completely out of alignment with the values and wishes of the Clifton community and greater Bristol wide goals. In its current form the plans are untenable. Please make the appropriate changes.</p>	02-Dec-22
353. O	<p>I would like to object to the current plans to develop the zoo gardens. The buildings proposed do not fit in with the character of this suburb of Bristol. I believe that they are inappropriate in design, scale, mass and form and would adversely change the nature of this part of Clifton and the Downs. Additionally parking in the area, which is limited, would be badly affected. Please reconsider the application and, if housing must be built, then require that the style and scale of any new buildings match the existing surrounding Victorian properties and that adequate parking is provided with the new development.</p>	02-Dec-22

354. O	<p>I am extremely concerned about the irreversible damage to the unique historical and aesthetic character of this part of Clifton should this proposal be granted permission. This is one of the most distinctive parts of BS8 and has continued to attract visitors (not just to the Zoo) as a place to be and in which to walk. The proposed structures appear (at least from the plans submitted) to be out of character aesthetically with the surrounding area and the existing structures in the immediate vicinity. The buildings appear to be huge in scale and height in particular, appearing especially vast next to the historically important and unique Zoological society building that will remain. The scale and scope of the proposed buildings are totally out of keeping, in height, aesthetic appearance and design. There are a number of mature and distinctive trees that would be felled for the proposed development. There is no going back once they are destroyed and the proposed structures built in their place. The excessive number of residences within the proposed plan would also further exacerbate parking problems in the area. The preponderance of parking spaces (to the detriment of publicly accessed external spaces) seems to run counter to BCC's declared commitment to a more environmentally sustainable city plan. Three different elevations of this development detrimentally and radically affect the appearance and character of three highly visible and distinctive parts of our district and our city. I object on the above grounds. Please think again, Bristol Zoo developers and architects, and please try to come up with plans that are sympathetic to this distinctive and unique area- it is such an important part of this city's history and culture. Smaller and more aesthetically in-keeping plans are required. You can do so much better than this. We have to protect and nurture our special spaces. When they are gone, they are gone forever.</p>	02-Dec-22
355. O	<p>Application no, 22/02737/F I am writing to object to the proposed development of the Bristol zoo site on the grounds that the area isn't suitable for housing. The buildings proposed are not in keeping with the area. Mr Alexander Bruce Resident of College Rd</p>	02-Dec-22
356. O	<p>This proposal is entirely inappropriate for the area.</p>	02-Dec-22

357. O	<p>The following represents a slightly revised version of the comments originally posted on August 7th. CHIS strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable. The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape, and skyscape of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique. Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely ignored. The following points summarise some of the most blatantly pernicious aspects of the proposals : 1. 196 dwellings represents a massively over-dense development of the site. 2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest. 3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the block on the northern boundary, 4. The proposed terracing is not appropriate in this area. 5. The loss of trees will be compounded by the inevitable damage to the roof systems of many other trees by infrastructure work. We urge rejection of this highly damaging Application.</p>	04-Dec-22
358. O	<p>The minor modifications recently made to this Application entirely fail to address the concerns of CHIS who consider it to be clearly contrary to BCS 22. It represents an over-intense and overbearing development which would, without reasonable justification, adversely affect the character of this part of the Clifton Conservation Area and the setting of its listed buildings. Our views are entirely in line with those of Bristol City Council's Conservation Advisory Panel of which CHIS is a member and whose letter of 20 November 2022 sets out in some detail the architectural poverty of the scheme and its detrimental impact on heritage assets.</p>	04-Dec-22

359. O	<p>The Clifton &amp; Hotwells Improvement Society strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable in their current form. The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape and skyline of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique. Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely ignored. The following points summarise some of the most blatantly pernicious aspects of the proposals : 1. 201 dwellings represents a massively over-dense development of the site. 2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest. 3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the six storey block on the northern boundary. 4. The proposed terracing is not appropriate in this area. 5. The loss of trees will be compounded by the inevitable damage to the root systems of many other trees by infrastructure work. We urge rejection of this highly damaging Application which, far from leaving a worthy legacy, would irrevocably damage one of the finest sites in Bristol.</p>	04-Dec-22
360. O	<p>These proposals are an affront to the present Victorian feel of this part of Clifton - a conservation area. The overbearing size of the proposed tower blocks which will overshadow virtually all of the present buildings should not be allowed. 196 units of housing in modern block look and the destruction of over 45% of the trees inside the Botanical Garden can only be described as appalling. The original site dating, in the main from 1846, has been a delight for the best part of 200 years. Surely the best use of the site now is for a public park, to be enjoyed by and used by residents and visitors alike with leisure facilities commensurate with its use.</p>	04-Dec-22
361. O	<p>I strongly object to this site being used for private dwellings. I view this site as a heritage site and should be used for the residents of Bristol and visitors.</p>	05-Dec-22

362. O	I object to the proposed plan on the following basis: Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park & Garden and an Important Open Space.	06-Dec-22
363. O	Scale and nature of proposed development not in keeping with historical use of the site as a public space benefitting the community. Also, major impact on traffic flow to an already busy area, and impact on rights of local residents for peaceful occupancy and enjoyment of their homes. Potential Impact on the adjacent college and the historic character of the area.	06-Dec-22
364. O	The proposal is at odds with Bristol's ambition to be Carbon Zero city by creating an environment that will reduce green space, increase traffic and destroy what is a beautiful part of our city - it would never happen in Bath!	06-Dec-22
365. O	object on multiple grounds - congestion, safe guarding (Young children at school in neighbouring buildings), health and Safety. This appears to be motivated by financial return rather than enhancing the community.	06-Dec-22
366. O	Dear Sirs With regard to the proposed planning on the former Zoo site, I feel I have no choice but to object to the proposed plans I fully appreciate that we need more housing and that this site could be used for this , but why in a conservation area would such an ugly, overbearing and completely out place development be proposed ? I live in this area and I even have to get permission to maintain and cut my trees , yet you are seriously proposing this development , I am sorry but it simply does not sit and leaves many unanswered questions So much could be done with this site for it to provide dwellings but in keeping in an area we have all been made fully aware is Conservation and must be respected There is no Conservation considerations with these's plans How very sad that yet again large developers are allowed to destroy beautiful area's with ugly buildings , why are we destroy our heritage that we will never get back	07-Dec-22

367. O	<p>Dear Sirs Although I thoroughly appreciate that we need more homes , I find it impossible to understand why on this beautiful historical site we would consider such a plan The infrastructure surrounding this site simply makes no sense ,the roads can't cope with the existing traffic , the doctors surgery cannot even offer existing patients appointments due to volume and where are the school places going to be found? I understood that bristol Council were very green and wanting us off the roads , as there are no local school places you are going to have parents needing to drive children to an available school , how is this environmentally friendly and working with the Councils policies , its a total contradiction to what the council are preaching to us Furthermore , the proposals so close to a school , where there are children walking around and crossing roads , how can you not even consider their safety fo all sorts of reasons , we have a duty of care to our children. This is a beautiful ancient site that we are going to desecrate with housing , surely the alternative plan for a virtual zoo is amazing , educational, forward thinking and firmly puts Bristol on the map as a city that really does care about the environment actions speak louder than words and the existing zoo can only benefit from this . It is so sad to see that no imagination is been given to this site , I despair for the future of our children and young people</p>	07-Dec-22
368. O	<p>I strongly object to this planning application.As I understand it Clifton is a conservation area and as a result 'special attention shall be paid to the desirability of preserving or enhancing the character of the area'. It seems to me that this proposed development are entirely out of keeping with the character of the area in design and sheer size. These large, characterless blocks will overwhelm the surrounding houses, gardens and streets, spoiling the look and feel of the area for residents, visitors and people simply driving through. I have lived in Clifton for twenty years and have always been pleased, and impressed, at the way recent buildings have blended in with the existing buildings. The Clifton College buildings along Guthrie Road are good examples. It seems to me hugely inappropriate that this planning application can be considered appropriate by the owners of the site, the developers or Bristol City Council.</p>	07-Dec-22
369. O	<p>I cannot really see how the development of 196 luxury apartments can benefit Bristol and the Clifton community. This has nothing to do with the current housing crisis since no average Joe will be able to afford one of those. What is planned here seems to be an enormous soviet style block of flats that is totally in contrast with the style of the surrounding area. I find totally absurd especially considering the fact that we are not allowed to change not even our extremely inefficient windows, yet such a money making monstrosity can be build. On top of this I find completely hypocrite to pretend that the garden will be somehow saved and access made available to the public. I understand the economic push behind such a project, but please consider that once we open to the transformation of this conservation are there is no way back. I am not really sure why we want to turn Clifton into Wapping Wharf. PS the dream would have been to turn the zoo into a botanic garden like Kew Garden the whole Bristol community can enjoy</p>	07-Dec-22

370. O	My reason for objecting to this planning application is that it is not the best option for the city of Bristol. If the proposed development goes ahead, the citizens of Bristol will lose a hugely important green space for which alternative uses more in keeping with the Zoo's charitable objectives have not been explored. There are sufficient flaws in the proposal for the planning application to be rejected on environmental grounds in keeping with planning law. The application should therefore be rejected and a better use found for this site originally intended as Zoological Gardens for the people of Bristol not a housing estate.	07-Dec-22
371. O	Bristol Zoo is such an important part of our local and national heritage. It has also helped to lead the way with animal conservation and preservation. The gardens were beautifully maintained and the animals were often part of a world heritage breeding programme. It is appalling that this site is now under threat. The Mayor of Bristol, the members of his cabinet, and the members of parliament who serve the city, and all city councillors must clearly demonstrate that they really care for the heritage of this city, so that future generations can enjoy this iconic site.	07-Dec-22
372. O	I object on the following grounds and others. - Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. - Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. - Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. - Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. - Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. - Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. - Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. - Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park & Garden and an Important Open Space.	08-Dec-22
373. O	I am a retired Architect & live a couple of blocks away from the proposed development. The height & scale of the proposal are both unacceptable in a conservation area where planning regulations are very restrictive. The quality of the architecture is surprisingly poor & monotonous & shows no sensitivity to its surroundings. In my opinion, the whole scheme needs a complete re-think.	08-Dec-22

374. O	<p>This proposal which is the largest construction project based in Clifton for many decades takes no account of the area being a conservation area. The planning team have refused to disclose the models they have used to seek planning permission but it is clear that a housing development for 196 homes will consist of several hundred meters of modern block of flats which will abut the perimeter walls. That will neither enhance nor preserve the character of the area. In addition, the buildings will overwhelm the gardens and obscure night views of the sky, mature trees and the historic buildings that characterise Clifton. Clifton is a major tourist attraction, both the bridge but also the buildings and to lose that as a consequence is shortsighted. Once an eyesore is built it can never be removed. Those of us who live here have to abide by stringent planning rules to ensure then integrity and historical nature of the area. If this development is allowed, it makes a mockery of the planning laws we abide by. In addition, it seems that 150 mature trees, just under 50% will be destroyed together with the historic ornamental garden. If allowed to go ahead, this development will be an invasion not only for those of us who live in Clifton, but for the City of Bristol as a whole which will have lost a unique and beautiful space.</p>	08-Dec-22
375. O	<p>The buildings on the boundaries of Guthrie Road, Northcote Road and A4176 are excessively tall. The elevations are very domineering with little in their design relating to properties in the surrounding area.</p>	08-Dec-22
376. O	<p>The revised proposal still consists of excessively high blocks all around the site perimeter which are far taller and denser than any surrounding buildings. The design does not compliment or reflect local building styles. The number of mature trees that will either be removed or relocated is very concerning as is the proximity of building works very close to trees being retained.</p>	08-Dec-22
377. O	<p>I object to the whole concept of this development which is to delete a key component of our rich and varied civic life to be replaced by private dwellings. With the whole planet in a crisis we desperately need local resources which are easily accessible and which are working towards a sustainable future and the enrichment of nature. This proposal is an affront to the people of Bristol, it is destroying something which very many of us have used and continue to value. It appears that the proposals have been railroaded through during the pandemic without any published documents about their value, or the options for maintaining a flourishing zoological garden on this site. This is not a private development. It is a valued public resource and I request that the Council commission a detailed inquiry into the whole matter before they allow this act of cultural vandalism to the institution, the buildings, the trees and the gardens all set in this conservation area.</p>	09-Dec-22



378. O	<p>Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	09-Dec-22
379. O	<p>I have received a letter which says that this planning application will have blocks of flats up to 6 storeys high built along the perimeter of the zoo site and that 150 mature trees will be removed. If this is the case then I object to this development in this conservation area. I would like to be sent a copy of the plans so I can comment on the detailed plans please.</p>	10-Dec-22

380. O	<p>I fully support the comments below as put forward by save bristol zoo campaign. We desperately need exciting ways to enhance the lives of Bristolians to improve their wellbeing and overall mental health. Squeezing more houses into an already over crowded city will not achieve this. There have been great alternatives put forward, particularly the ground breaking virtual zoo concept, that would be such a great attraction for our city and bring much needed tourist income. Please think strategically and conserve this unique site - a site that deserves so much more than just more boring houses that will only benefit a few. Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	10-Dec-22
381. O	<p>This is such a great opportunity wasted - we don't need more housing as much as we need stimulating activities for us all. The other non-housing related proposals offer so much more in terms of tourism, genuine sustainability during a climate emergency, and amenity to the whole of the Bristol population and beyond. We owe it to the legacy of Bristol Zoo to replace it with something innovative, fun, and engaging, supporting people's mental and physical health. There are plenty of other sites for housing that are better suited to such purposes. PLEASE save this precious and historic space and amenity for generations to come - something Bristol can be proud of. Thank you.</p>	10-Dec-22

382. O	<p>As a resident of Bristol for 35 years, I find these plans to be completely contrary to what is best for the citizens of the city as a whole, its richness of experience and culture, and a grim, joyless prospect for what was until recently, a colourful beacon of Clifton and the city as a whole. I believe the negatives to be thus: Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	11-Dec-22
--------	--	-----------

383. O	<p>I write to voice my strongest possible objection to the proposed change of use at Bristol Zoo Gardens. This asset belongs to my future grandchildren and to their children when I am long gone, to enjoy just as my father enjoyed the days of Alfred entertaining the crowd and the students who borrowed Alfred after him. The Zoo is a part of Bristol's identity and the city will be lesser without it. While I welcome an end to the caging of large animals, putting an end to this moral wrong should not result in the loss to the community of a public site which holds such enormous cultural and historical value to the city. There is enormous potential for commercial use located within a densely populated area. The clientele of young families is literally on the doorstep. What evidence is there for professional and independent consultation over alternatives to closure? Has there been any consumer survey completed to demonstrate that the larger animals were in fact the main attraction? If the larger animals were replaced with alternative exhibitions, with an educational and perhaps a conservation theme, reflecting the enormous wildlife heritage of BBC Bristol for example, would the business model not have worked? If businesses like Airhop, Par 59, The Wave can all make it work in out of town locations why on earth can the Zoo Gardens not run for a profit when it has the population on the doorstep? These types of attractions have lower running costs than cages lions and higher potential revenues. What efforts have been made to pursue this sort of plan? Where is the evidence that climbing walls in the Giraffe house, adventure playground in the monkey temple would not be viable? These are iconic buildings that belong to the city and should not be given over to executive housing. Furthermore, expecting families to travel out of the city to the new Wildspace site is a contradiction with environmental requirements to make less journeys and there will be a huge loss of green space and trees. This decision requires more public debate and consideration. Housing is not the answer here.</p>	11-Dec-22
384. O	<p>I oppose this proposal which fails to enhance the Clifton conservation area. - Proposed architecture is not sympathetic with the surrounding established character and context - It will cause unjustified and irreversible harm to listed buildings - There is no convincing argument that a better considered visitor attraction would not be successful in this site. It has heritage as a visitor attraction, existing infrastructure and the huge advantage of city centre location. If other visitor attractions like AirHop or The Wave can be successful then why not the Zoo Gardens? This needs a change of commercial direction and better management, not executive housing. - The proposal has the impression of exclusivity and a gated community, which is at odds with the culture of the city. - Public access to this public asset is not legally assured within the plan - Not allowed for in the statutory local plan - Failure to give "considerable weight" to a heritage asset Therefore not in accordance with applicable conservation legislation - Clear danger of erosion of BCC's standards applicable to future conservation area planning proposals I support the BCC Conservation Advisory Panel's submission, and that of Historic England, who have commented that the closure of the zoo site will have a pronounced harmful impact on the significance of the site</p>	11-Dec-22

385. O	I was born, educated, and have lived all my long life within 10 miles of Bristol. It has been a huge privilege to enjoy all the special features that the city has to offer. Among those features the Zoological Gardens figured largely in my childhood, and in the childhood of my daughter and my grandchildren. My memories of Rosie the elephant and Alfred, the gorilla with attitude, go back to the 1940s, and I find it incomprehensible that closure should even be considered. There are arguments to be had about keeping large animals in captivity, but they are not significant factors in the present debate. The Zoo is a magnificent asset to the city which Bristol can ill afford to lose. Please think again!	11-Dec-22
386. O	Absolute disgrace. The zoo (and anyone else associated with this proposal) should be ashamed of these plans - clearly out to maximise profit with no consideration for anyone else. This should never be allowed to happen and if the City planning department lets anything like this through they should be ashamed too. It is totally out of keeping for the area, destroying a beautiful place in a conservation area with dreadful edifices which don't fit in. It is not wanted and not needed, totally unfair on the local residents, and the safety and safeguarding concerns of the development and the tall buildings overlooking a school is significant.	12-Dec-22
387. O	This is a dreadful proposal in so many ways. It would mean too many people living on what is a relatively small site. This in turn will generate much unwanted traffic on already busy surrounding roads. The perimeter building designs are hideous and far too large, completely out of character for the area and far too imposing for the residents adjacent to the site. There is no consideration for the site's neighbours, in terms of traffic flow and also there would be major disruption during construction. Apartments overlooking a school lead to safeguarding concerns, as well as concerns of road safety & pollution. In the proposal, the gardens are to be kept for the public, but why would 'the public' visit such a confined ugly site, which would be effectively a private housing estate. Also the removal of several trees etc. is not showing much protection for this side of the proposal and the surrounding buildings would detract from them anyway. For an organisation so committed to the environment and ecological issues, this is an embarrassing proposal which disregards these values for the surrounding area. It just looks like a planning application looking at profiteering rather than considering any impact on the surroundings and is irresponsible. Even if this is refused and a smaller design is resubmitted, it would still be an inappropriate proposal for the regeneration of the site.	12-Dec-22
388. O	I've been visiting the zoo since I was a child (1998) and it holds many special memories for me, as I imagine it does for many. I think it would be such a disappointment to replace such a historic place with a housing estate! The area does NOT need more houses!!! I believe the space should be turned into something which respects the environment and the history of the place. It should be a space for people to enjoy, relax and just be away from all the stress of life - like it has been since 1836. Honestly, would be an absolute disgrace if it was replaced with a housing estate...	12-Dec-22

389.	O	I object to this application because it is so obviously out of keeping with the character of the rest of the neighbourhood. I also doubt that the infrastructure is there to support all the extra residents - roads are already busy in that area. Very disappointing that this is being proposed in this city. I live in Clifton although not can immediate neighbour.	12-Dec-22
390.	O	This development is not at all sympathetic to the character of the area which is unacceptable for a conservation area. Bristol zoo and its gardens were a beautiful green space and the scale and design of the proposal is at odds with preserving this historic site's character. Additionally, this will cause parking issues as it is unclear where residents would be able to park and Clifton parking is already very tight.	13-Dec-22
391.	O	I object to the planning application on the grounds that it will mean a loss of valuable communal and green space that has come to mean a great deal to the people of Bristol. The plan would require the felling of many of the trees at a time when we should be fighting for the planting of trees not their destruction. Many others are likely to be damaged. The public green space will be much smaller. The Bristol Zoo Gardens are listed as a local Historic Park and Garden and are an important open space. If the space is turned over to apartments it will become inaccessible to others. Such intensive development is also likely to result in harm to listed buildings and the change in building density is a negative one. The buildings proposed are out of scale and unsympathetic to the surrounding buildings. They do not complement the houses or college buildings nearby and will form a huge continuous block along the road. Other alternative plans for this site need to be explored	13-Dec-22
392.	O	I objected before the revised plans. I object again as the changes from the original plans are minimal. The proposed buildings are still too high, too imposing. They will completely change the character of the area, which is a conservation area by the way. The original issues still remain. With these plans, there will be added traffic, more parking problems, added air pollution in the area.	14-Dec-22

393. O	<p>I accept that the Zoo animals will have more space at the Wild Place project. However, it is a big shame that we cannot be more imaginative about the use of the site and have to turn it into a strange housing estate. In effect, the plan is to have a few premium houses within the actual grounds of the zoo surrounded by very tall blocks of flats. These blocks of flats will seem very incongruous in the neighbourhood and will be towering over current neighbouring buildings, blocking their natural light and views and creating more traffic and parking concerns. Indeed, the plan provide some parking, but don't take into consideration the extra visitors to the new lodgers, which will add to the parking problems. The idea of keeping the gardens open to the general public is a good gesture, but in effect, the general public won't be travelling to the area just to walk through these gardens and in time, these will only be to the benefit of the people living there. Also these new flats will probably be overlooking the adjacent school's playgrounds and classrooms, which could be a safeguarding issue for the school. My main concern is the height of these buildings and their design which will make them stand out in the area and not be in keeping.</p>	14-Dec-22
394. O	<p>This site must remain as a public resource, and definitely not given over to private investment. Disgusted that it is even being considered.</p>	14-Dec-22
395. O	<p>The proposed development is aesthetically jarring. It is completely unsympathetic with the area, a conservation area. No attempt has been made to blend in with the area. It is hugely imposing and will completely change the appearance of the area. The proposal to build right up to the boundary without softening the structure with the use of planting around the boundaries is at total odds with the area. It is appalling that a key historic site in Bristol has been allowed to close without any thoughts on how it could be replaced with something that brings benefits to society in a similar way. Instead of removing planting and trees that help the environment. Bristol city council is happy to approve a development that has a huge negative environmental impact. Surely this is at odds with the councils aims and objectives. This could have been an opportunity to create a site that enhances the environment, that helps support learning about the environment, perhaps a similar project to the Eden project or Westonbirt arboretum, rather than another housing development of "luxury one and two bed flats". What a wasted opportunity, Bristol City council you should be ashamed!</p>	16-Dec-22

396. O	<p>The proposed development is aesthetically jarring. It is completely unsympathetic with the area, a conservation area. No attempt has been made to blend in with the area. It is hugely imposing and will completely change the appearance of the area. The proposal to build right up to the boundary without softening the structure with the use of planting around the boundaries is at total odds with the area. It is appalling that a key historic site in Bristol has been allowed to close without any thoughts on how it could be replaced with something that brings benefits to society in a similar way. Instead of removing planting and trees that help the environment. Bristol city council is happy to approve a development that has a huge negative environmental impact. Surely this is at odds with the councils aims and objectives. This could have been an opportunity to create a site that enhances the environment, that helps support learning about the environment, perhaps a similar project to the Eden project or Westonbirt arboretum, rather than another housing development of "luxury one and two bed flats". What a wasted opportunity, Bristol City council you should be ashamed!</p>	16-Dec-22
397. O	<p>This development will cause unjustified harm to the community. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. There is no need for more luxury housing in Bristol, this is a greedy money grabbing proposal that does not satisfy any needs for this city. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. It is shameful to see such a site in Bristol go from being a wonderful public attraction to more unaffordable housing in a city with a housing crisis. I firmly object to this proposal.</p>	18-Dec-22
398. O	<p>This is so sad! the proposed development is monolithic and totally out of keeping with a historic and valuable part of Bristol. 6 stories of uninterrupted blcks of appartments will dominate the whole area downgrading neighboring historic buildings.I think overbearing is the most suitable word.. really destroying an area of great beauty. the cynicism of this development is also exemplified by their pretence that they are retaining the current fantastic communal garden space. How can the council- in these ecosensitive times, consider cutting down about 150 mature trees plus ornamental gardens leaving only a small enclosed space losing one of the really valuable open spaces in Bristol. t This is a total violation of the values I thought Bristol City council states it adheres too.I do hope you will see sense and turn down this appalling application that seems to pander to profit for a few and loss of facilities for many</p>	18-Dec-22



399.	O	I used to visit Bristol zoo with my Dad as a child . It was one of the day trips in Bristol he would take me on. I can remember it vividly because it was such a happy time. Bristol Zoo is iconic to Bristol, a key feature of its culture and what makes Bristol Bristol. It is a location for inspiring, learning and memory making for all ages. To lose the zoo would be a huge loss to the cultural and communal value of Bristol. It is a historic and fundamental part of Bristol. I understand the need for housing, this is a pressing issue and a very serious one. However Housing that demolishes a site with value and purpose , a site that brings joy to children's faces and prioritises nature and diversity , should not be shut after 186 years to create a site to house a few in comparison to the infinite number of smiles on people's faces if the zoo stayed open. I wholeheartedly object the proposal. I am in favour of building new (AFFORDABLE) houses , however not on sites that already have value and purpose to the community of Bristol. It is a waste of resources , time , energy and a lack of understanding of what the people of Bristol need. Please reconsider this proposal.	18-Dec-22
400.	O	As a resident of the area, I have looked over the proposals. I was optimistic, as the public were to gain free access to the gardens, but the plans are disappointing. The style given to the accomodation does not come close to respecting or matching the architecture of its surroundings. The historic surroundings of this green space need to be taken into consideration. This seems to be over-development, in stark contrast to the environment that residents. The appeal of the gardens is greatly reduced if they are in the centre of a housing estate. I object to this proposal. The scale of building and architectural style are inappropriate. Please reconsider, and if building, build beautifully.	19-Dec-22
401.	O		20-Dec-22
402.	O		20-Dec-22
403.	O	The proposed development is on too big a scale and the design is totally out of keeping with the neighbourhood. If permitted it would have a completely adverse effect on the character of this conservation area and it would not be a fitting legacy for the Zoo. I also understand that many mature trees would be lost as part of this proposal: this is surely not appropriate particularly as the council has no funds for tree-planting with the consequence that Bristol residents have to sponsor trees to be planted. The city cannot afford to loose any trees.	20-Dec-22

404. O	<p>As residents of Clifton living approximately 200-300 metres from the zoo, my wife and I very strongly object to this proposed development. The plan submitted to the Council appears to entail the construction of hundreds of metres of uninterrupted and overbearing blocks of flats up to five or six storeys high in material and in an architectural style that are grotesquely out of keeping with the historic buildings in this part of Clifton. It seems that the project will also entail the felling of a large number of mature trees at a time when, for ecological reasons, we are coming to think we should in fact be planting more of them. The proposal cannot possibly be regarded as an enhancement of the character of what is a conservation area. On the contrary, it will manifestly detract from the appeal of the area and render the definition of it as a conservation area obsolete. Were the Council to permit this proposal to proceed, thus allowing buildings of quite incompatible appearance to stand next to one another, it would be difficult to imagine what justification there could be for continuing to require residents in nearby houses such as ours to obtain formal permission to change the external appearance of our properties in relatively minor ways.</p>	20-Dec-22
405. O		21-Dec-22
406. O	<p>Morning Matthew, I hope you are well. We understand from Sinead McKendry of Savills that they have issued a clarification additional to our Objection dated January 2023, grateful if you could note our clients position in this light: 1) In our objection dated January 2023, we note that "A Visually Verified Montage (VVM) view has been provided from across the College playing fields (The Close), from the base of the Cricket Pavilion. However, this only demonstrates the outline of the proposed South Buildings along Guthrie Road with a height of 3 to 4 storeys and not the larger scale development that sits at a higher level, namely the proposed perimeter apartments that make up the North Buildings with a maximum height of 6 storeys or the East Buildings which range in height from 3 to 5 storeys." Our concern with the VVM is not simply the location it is taken from but rather what it does/does not show in terms of detail, notably we do not think it shows the full impact of the taller buildings on the BZG site on the College's Main Campus. As such our objection still stands. 2) In regard to Location we state the following in our objection dated January 2023, "Additionally, the proposed view included within the VVM is neither taken from the protected Local View (LC24) which runs from the south-west corner of the College's Grounds or the identified Long View (L25) as identified in the Clifton and Hotwells Conservation Area Character Appraisal (CACA) Important views and Landmark Buildings Map. Long views are long distance views across the City to key features or landmark buildings. In this instance Long View L25 stretches from the grounds of Clifton College northwards across the College and BZG site, both of which are identified within the CACA as Landmarks of City-wide importance. As a consequence of this the College consider the VVM does not accurately reflect those protected views, as identified in the CACA, and request an updated VVM which accurately reflects the impact of the proposals at the BZG site on Local View LC24 and Long View L25." The College did last year request that a VVM be taken from the School Grounds, however, this should not have discounted VVM's from the two identified CACA protected views, but rather added to these to ensure that a robust approach is taken to all views across the Conservation Area. Whilst the College's priority is to ensure that the</p>	21-Dec-22

	<p>College itself is duly considered in the Planning Process, as reflected in the attached email correspondence, this does not change the Policy position on protected views which are clear on where these are located and it is felt should have also been drawn from to provide comprehensive coverage across the entirety of Colleges main campus (in line with the CACA identified views). As such we consider our concerns to still be relevant and recommend that Historic England are asked to confirm that they are content with no VVMs of these protected views, in their assessment of the overall proposals. Additional to the above I would appreciate if you could confirm that the planning application is still on track for a decision on 15th March 2023 at Planning Committee or if the date has been pushed back in light of the additional commentary received.</p> <p>Kind regards, Beth Elisabeth Pywell MRTPI Senior Planner CBRE   Planning and Development</p>	
407. O		21-Dec-22
408. O	<p>I am objecting strongly to the proposed development on the basis of its total lack of keeping with the local area, with plans to build towering flat blocks that will dominate the skyline and destroy much of the beauty of this conservation area in which I have lived for 17 years. This is a legitimate concern based on requirements to pay special attention to the desirability of preserving or enhancing the character of the area. Even without getting into the appalling plans to fell over 150 mature trees and bulldoze historic gardens (at a time when green spaces and plants are more urgently needed than ever), these plans are utterly out of proportion with and inappropriate to Clifton and the zoo site itself. I urge total rejection of these plans and development of more sympathetic, attractive plans that honour Bristol Zoo's long legacy.</p>	21-Dec-22

409. O	<p>Dear all, after having gone through some of the documentation provided in the next tab, I would like to object to the current planning application. Below are some of my reasons: 1. The height of the buildings proposed will be disproportionately tall compared to the rest of the lower lying living areas. Such a massive block of flats in the area will lead to the surrounding streets becoming shadowy and much less attractive to the eye. Architectural designs today, should consider the wellbeing of surrounding communities and be inclusive. As mentioned during World Architecture Day 2022, architecture can make our lives better by protecting, developing and restoring health. It has the power to contribute to the physical, emotional, environmental, financial and social wellness of humankind, all while having a positive impact on the environment. 2. Secondly, as a critical part of Clifton's and Bristol's history and heritage, the design and planning of the new use of the space should have been done, or should be done now, with the participation of the impacted community - ie: the Bristolians, who have lived, live and will live with the Zoo and its future self. 3. Bristol is a city that strives to be inclusive, and promote a just transition. This exceptional site in one of the hearts of Bristol should be representative of this energy. The use of the 'Dugnad' process of communal decision making where people come together from across the community around a shared interest could be used. A technique called 'splotting' could also be applied allowing participants to map how they experienced and participated in their local place. Be part of a Just Transition. 4. As Heritage England had pointed out, the current design for the entire space is stocky and exclusive. If the aim is to open up the space and make it accessible to all, shouldn't the design be open, social and regenerative? - some examples of just transitions within architectural design: <a href="https://medium.com/design-council/design-for-a-just-transition-co-design-community-care-ccbe1136ee05">https://medium.com/design-council/design-for-a-just-transition-co-design-community-care-ccbe1136ee05</a> Thank you for your consideration, Kindly</p>	21-Dec-22
410. O	<p>This proposal is completely inappropriate for what is one of the most iconic and beautiful parts of the City of Bristol. The sheer scale and mass of the proposed blocks of flat is completely out of character with the neighbouring properties and will seriously impact on the beautiful gardens that lie within the existing zoo grounds. While not against the principle of residential development it should be on a smaller scale, with lower buildings and more empathetic to its immediate environment.</p>	22-Dec-22
411. O	<p>I have lived in Clifton for 20+ years adjacent to Bristol Zoo and it has always been a fantastic community asset. It will be a very sad reflection of our city if this application for planning is accepted. A green space used by many (irrespective of seeing animals) would be lost, mature trees cut down and in its place we would have a concrete jungle totally out of keeping with the Grade II + listed buildings which surround it. I understand the need for housing but I believe every application must stand on its own merits and as a local resident I find very little merit with this proposal. Therefore I urge our councillors to please REJECT this application.</p>	22-Dec-22

412.	O	WHY,WHY,WHY,WHY,WHY? Unbelievable. Firstly I am not against new housing of any sort and especially support affordable homes but the design of these flats is just not in keeping with the local area. SIX stories tall - NO parking - typical inner city design in a much more rural area. Secondly - 150 Mature TREES being cut down. Bristol zoo is a conservation charity - obviously only of animals which brings me to my third point.... WHERE are all the animals going? Apart from the Gorillas they are being palmed off to anyone that will have them. Perhaps I will be feeding them in cans to my dogs soon? If this is the legacy of Bristol zoo - then its a very sad day indeed. Its all about the money.	22-Dec-22
413.	O	I object strongly to the proposed plans for Bristol Zoo. I have lived in Bristol all my live and the zoo and Clifton have always been a beautiful space to spend time in. Modern blocks of flats are unsightly. They look unsightly in the city centre and in a few years time they will be out of date and unfashionable. Clifton is a beautiful area with stunning old buildings. Any development should be in keeping with the architecture of the area. Whoever the developer is, they are clearly trying to erect cheap material flats to maximise their profits. Bristol council should be looking after it's residents and keep areas of beauty-beautiful. The zoo gardens are mature and diverse and should be preserved at all costs. Protect historic treasures do not trash them with modern architecture that is not in keeping with the area at all.	22-Dec-22
414.	O	The proposal is a horrendous monolith to the picturesque and historically significant surroundings. It is wholly out of place. The design must reflect and match the style of buildings surrounding it. It must not be so over empowering of the nearby buildings. It overly dominates the skyline	22-Dec-22
415.	O	Absolute abomination of a design. I don't object to development but it should be houses similar design to those in the surrounding roads. Not stuffing in a high rise block of flats. It's too high and not sympathetic to the local environment and architecture - sticks out like a sore thumb - and the design will date terribly. Not to mention the problems with parking in the local area.	22-Dec-22
416.	O	The plans for these flats completely ruins the existing neighbourhoods profile. The surrounding road network is beautiful. These designs are not going to age well and will be an eyesore. Clifton landscape deserves better!!	22-Dec-22
417.	O	The aesthetics of the buildings look completely out of keeping with Clifton buildings. Surely they should be made in a similar stone, to match Clifton. Any other building that applied for permission in this material would not be permitted. Please don't ruin our beautiful area by allowing this.	23-Dec-22

418. O	<p>I am a former resident of Clifton, and the similar areas north of the downs. It's renowned for its stunning historic buildings and character, and the scale of this treasure is quite unique. It was a very special place to live and I miss it dearly. It has the odd but of modern infill, but they are few and far between, and small in scale. This application is an absolute outrage. It is so monstrous in scale and so unbelievably monotonous and ugly. It looks like a prison. Most of Clifton is grade I or II listed to preserve its historical character. This is a headache as a home owner, but one you respect and value as you and your neighbours all have to maintain the beautiful historic character of the area, together. This application is utterly out of keeping with the character and low level scale of the historic buildings already in the area. Including those along College, Guthrie and Northcote Roads. This should be immediately rejected.</p>	23-Dec-22
419. O	<p>I am writing to object to the planned development at Bristol Zoo Gardens. The currently design is totally out of keeping with its heritage surroundings. Some of the buildings are block like and too high and imposing. They are unsympathetic in scale and design. The development as a whole does not preserve or enhance the character of the area. Of course, we need new homes and homes that are affordable. No one can disagree with this. However, we surely need to make sure the priority is for well-designed housing which is not totally out of keeping with its surroundings. I am particularly concerned at the loss of so many established and mature trees. Recent research by Prof Disney at UCL has shown that UK's old trees are critical to the fight to combat climate change. In his words: 'The value you have in large mature trees is almost incalculable and so you should avoid losing that at any cost - regardless of how many trees you think about planting.' Importantly, the development seems totally at odds with the conservation and ecology aims and values BCC and the Zoo constantly claim to champion. Once this historically rich site is lost we can never get it back. Bristol Zoo Gardens is iconic and its animals and garden have been a huge draw to people visiting Bristol for 185 years. Replacing this with such an unimaginative block is surely not the legacy we wish to leave to future generations?</p>	26-Dec-22

420. S	<p>Comments on Planning Application 22/02737/F - Redevelopment of Bristol Zoo Gardens My comments fall into three different camps: 1. Reflection on my time visiting the zoo. 2. Comments on the architectural / technical proposals for the redevelopment. 3. Comments on Bristol Zoological Society's (BZS) decision to close Bristol Zoo Gardens. As I understand it Bristol City Council's Planning Officer (or Planning Committee) will solely consider the merits of redevelopment application and not retrospectively judge BZS's closure decision - although there is a "grey area" surrounding "case for redevelopment not proven" where the Planning Officer could delve back into the reasonings why Bristol Zoo Gardens were shut. My comments on BZS's closure decision are included in the hope they are read by BZS and that a U-turn might still be possible. Part 1 : Reflection on time visiting zoo. Just like many of the comments given so far, I'm starting from the 1970s with these two photographs. ADD PHOTOS I think they are 1975 and 1978. Nice flowers and I'm wearing the panda tee shirt. I haven't included more recent photographs of my children enjoying the zoo, but suffice to say that Bristol Zoo Gardens is a major part of the city and it is a great shame it has shut. Part 2 - Comments on Planning Application Submission It is sad that Bristol Zoo Gardens have closed but having read the Design and Access Statements, the Heritage Report, the Landscaping Proposals and viewed a number of the drawings I support: 1. The principle of "massing" of the development proposals around the perimeter to retain as much of the central gardens as possible. 2. The opening of the many new access points around the perimeter. 3. The retention of the Aquarium (former Bear Pit), Aviary, Monkey Temple and Terrace Theatre as structures that will be retained (and refurbished etc) as public garden features etc. Ditto retention of the Grand Terrace. 4. The conversion of the Entrance Lodge into the Clifton Conservation Hub (CCH) with café, exhibition and office spaces - even though the last thing Clifton needs is another café. I feel the following aspects of the Planning Application require further detailing: 1. Whilst the Design and Access Statement (page 10) gives overview details of the Management Board that will be responsible for the upkeep of the public gardens and structures (upkeep to be paid for via a Resident Service Charge to all residents, excluding the 20% "affordable housing residents"), the Planning Application proposals should provide greater details for the Management Board. Matters such as (i) legal powers, (ii) longevity of tenure, (iii) frequency of meetings, (iv) dispute resolution arrangements and (v) Mission Statement for the Board should be fully defined at this Planning Application stage. 2. Who owns the CCH building? 3. Details of the type and height of back (private) garden fencing (or walls?) for the houses in the central areas of the site, as this information is not shown on any Plan or Elevation drawing that I could find. 4. The high number of resident bicycle parking places and low number of resident car parking spaces should be applauded. Will the 6.8m wide main road be double-yellow-lined to restrict parking? 5. What prevents a further planning application being submitted (in the near future) for further housing on the West Lawn / East Lawn / Central Play Area etc? 6. What prevents "urban creep" for say paving over grassed areas for additional car parking ? Part 3 - Comments on Bristol Zoological Society (BZS) earlier decision to close the zoo. 1. It does seem like a "rushed decision" as there was a vary rapid change in policy between 2019 and 2020 when Bristol Zoo Gardens was declared no longer viable and "all eggs were put into one basket" at The Wild Place. Why is there no clear independent security of this decision? 2. Whilst the graph of long-term visitor numbers is declining, the rate</p>	27-Dec-22
--------	--	-----------

	<p>of decline is surely only marginal. Why was no "extra marketing strategy" and/or "no fund raising appeal" attempted? 3. Clearly "the general public" is fully aware that large animals can no longer be kept in small enclosures and everyone understands how BZS needs to take this into account. Ultimately, given its limited land footprint, this means Bristol Zoo Gardens evolving into a "smaller creatures only" zoo with a second facility at The Wild Place catering for "larger creatures". Why wasn't the two-site re-branding of Bristol Zoo Gardens and The Wild Place into "small creatures" and "large creatures" ever tried? 4. There is a long way to go and I fear BZS have under-estimated the scale of the technical task, the time periods involved, the financial risks and extent of "bridging the gap" between the zoo closing and a redeveloped Wild Place opening. a) I suspect obtaining planning permission for the housing re-development will take significantly longer than any original estimate would have stated. This delay will "knock-on" to everything, not least the care costs of the animals currently caught in limbo. Ditto staffing costs. b) The eventual purchase price of the Bristol Zoo Gardens land by the Housing Developer might be sizeably lower given: i) Housing developer's forecast build costs increasing with inflation: ii) The "financial model" starting with a bank base rate of 0.1% in December 2021, but now having to deal with 3.5%. iii) General forecasts of house price reduction and the collapse of the buy-to-let market. c) The BZS's development costs at The Wild Place are probably increasing with various complication factors including: (1) Lack of skilled / specialist contractor resources / general "over-heat" of construction market (2) Difficult ground conditions at The Wild Place. (3) Difficult topography meaning that only a small proportion of the land is actually usable. (4) Logistics of building new facilities at same time as keep venue open. (5) Costs of utility infrastructure (power, sewerage connections etc). (6) The phasing of the Wild Place redevelopment. Will BZS wait for 100% of re-development to be completed or "part open" but risk new visitors thinking it was still mostly still a building site? d) The overall "bridging period" between the Bristol Zoo Gardens closing and the expanded Wild Place fully opening will probably be a lot longer than original envisaged, and hence the "profit" for use in (i) making the BZS yearly accounts more sustainable and (ii) funding new conservation work may be considerably less than originally thought. e) But perhaps my biggest fear is that The Wild Place does not have the heritage, tradition, location and following that Bristol Zoo Gardens has (even if it were to become "small creatures only") and hence I worry that BZS will face falling Wild Place visitor numbers in the years to come. Conclusion I do not support BZS's decision to close the Bristol Zoo Gardens and feel that a two-site strategy of "small and digital" at the current site with "large and wild" at The Wild Place was not properly explored - and ought to have been. I do not have the facts and figures behind BZS's decision, but presumably it was taken after extensive studies. I just find it strange there seems to be no public record of signatures from all of the BZS Trustees supporting the executive's decision. The closure of Bristol Zoo Gardens will mean that Bristol, as a diverse city, will be forever poorer. A successful, world-class, Wild Place at the M5-motorway junction will clearly help fill the void left behind - and let's hope it more than fills it, but also enhances it. As Bristol Zoo Gardens have closed, and unless BZS undertakes a U-turn, I support the Planning Application principles subject to the comments listed in the central "Part 2" of this letter.</p>	
--	---	--



421.	O	We don't need any more people or any more housing stock in Clifton. I don't care what the finished buildings will look like - blocks of flats are totally incongruous with the character of the area. Keep the gardens as they are and turn the rest of the site into a park.	28-Dec-22
422.	O	The plans shown for the redevelopment of the zoo in no way reflect the heritage, beauty and open spaces that are to be replaced. Mature trees should, in my opinion, not be removed for profit only. Sky vistas are important for our mental health. Access, presumed permanent, was promised to the beautiful gardens of the zoo, imagine this will now be shortlived. Concrete high rise buildings do not, in my opinion, complement the existing architecture rather scream "lets make money"!! I recognise the need for more housing and that such a prestigious site will not be left abandoned but surely we have architects in this country who can better reflect the existing community and present something with harmony.	29-Dec-22
423.	O	I wish to object to this planning application for the following reason: Bristol Zoo Gardens are within the Clifton Conservation area, and most of the buildings on the existing site are on the Local List. Clifton is a conservation area because of the historic nature of the architecture, the special character and appearance of the area, the distinctive views, the green spaces, and the trees and street furniture. These are all aspects of the area that the local authority should be preserving or enhancing. The proposed development does not comply with the planning obligations for a conservation area and should therefore not receive planning permission.	29-Dec-22
424.	O	I was horrified today to be made aware of the unsympathetic and overbearing nature of the proposed developments at Bristol Zoo. I believe that planning law requires that special attention is given to the desirability of preserving or enhancing the character of the area. The proposals may be suitable for Broadmead, but surely not for Clifton. We don't want to lose the character of Clifton and such a large unsightly development would harm the area in so many ways. It's too big, it's overbearing, it's overwhelming, it's unsympathetic. Please reject.	29-Dec-22
425.	O	I wish to object to this planning application as the current plan does not take into account the current character of the Clifton area. The current planning law states that "special attention be paid to the desirability of preserving or enhancing the character of the area." The current plan shows a block of characterless flat which bear nothing in common with the existing local architectural and design of the building and thus the flat will stick out like an eyesore.	29-Dec-22

426.	O	To be clear, I am not in sight of this development, so cannot be accused of 'not in my back yard' syndrome. However, this is a place dear to my heart and that of many Bristolians. Is this a case of 'Big Business Wins No Matter What The People Say'? Sadly I think so, but having said that I still wish to lodge my objection to what would be a complete and utter eyesore on one of our most precious green and open areas for the general public in Bristol. This could have been turned into a place for 'green education' for our younger generations, but it will now sadly fall into 'fat cat developers' hands and become a concrete jungle instead. A forward thinking council with the benefit of future generations in mind. Anyone know of any? It certainly isn't Bristol that's for sure.	29-Dec-22
427.	O	Address: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA The proposed redevelopment of the Bristol zoo site is an abomination. How on earth can those buildings be allowed in a Conservation Area? The scheme is ugly and entirely unsympathetic to Clifton and its surrounds. The scheme will be blot on the landscape. Scale this development down - and please redesign this unimaginative mess.	29-Dec-22
428.	O	The outlook is not aligned to the conservation area. It is ugly in this area and looks so different in clifton. I will feel sad if I walk around here seeing this along the road. This is a very sad thing to see such contemporary sitting in a conservation area. Please do not do that.	29-Dec-22
429.	O	Architecturally Unsympathetic to the surrounding listed buildings and conservation area. Loss of trees & natural habitats. Increased pollution. Increased on-street parking pressure. Pressure on local primary school places. Insufficient 'legacy' for neighbourhood & local community. .	30-Dec-22
430.	O	Architecturally Unsympathetic to the surrounding listed buildings and conservation area. Loss of trees & natural habitats. Increased pollution. Increased on-street parking pressure. Pressure on local primary school places. Insufficient 'legacy' for neighbourhood & local community. .	30-Dec-22
431.	O	Having been to several of the Architects meetings held at Bristol Zoo to show the provisional ideas of the Zoo site, I still feel as I did then. These plans which have been submitted to the planning office pay no attention to the wish of the local and wider community to preserve and enhance the character of the area. The plans mimic high-rise office buildings or future crammed slum conditions. The plans pay no respect the value to the work the Bristol zoological society has been doing to enhance our wildlife, our environment and our unique city for over 100 years. It is appalling of the Savills agency and the Architects to submit these plans or the city planners to even consider them.	30-Dec-22

432.	O	Converting a zoo into a block of 196 flats sounds like a grubby deal to provide extra cash for the council. The proposed project will damage the neighbourhood by increasing the number of residents in the area without readjusting the current infrastructure. Hence, this project will burden the community already under pressure. The council does not seem to manage to collect rubbish in our community on time and each rubbish collection is leading to a messy street. This project will have a lasting damaging impact and shall be aborted.	30-Dec-22
433.	O	To build an eyesore where Bristol Zoo currently stands is horrific. I think the zoo should be replaced with something considered, that will add to the community, just like the zoo did. A beautiful gardens with amenities and picnic area would be a wonderful idea. Building hideous multi-storey flats in the middle of Clifton which is a beautiful area full of period and listed properties should be illegal. I am completely against the flats. I would like this area to be in keeping with what currently stands there; nature and stunning scenery.	30-Dec-22
434.	O	The Zoo's relocation to the Wild Place site leaves a heritage site which deserves to be developed to for the benefit of the city and its residents. Sadly the proposed redevelopment is not in-keeping with the character of the area in either form, scale or surrounding landscaping. The continuous frontage of blocks of flats dwarf neighbouring residential and college buildings, and considering the Conservation Area status of the neighbourhood, neither preserve nor enhance the character of the area. Given the Zoo's long history within Clifton and the public amenity, green space and communal value it has offered to generations of Bristol citizens and visitors, the site warrants a more fitting, thoughtful legacy that will benefit the neighbouring and citywide community than the housing estate currently proposed.	30-Dec-22
435.	O	Doesn't fit in with the architecture of clifton at all,	30-Dec-22
436.	O	I wish to object in the strongest possible terms to the proposed development of the former Bristol Zoo site. The proposed development is utterly inappropriate in terms of scale and of visual impact and shows no regard for the unique character of the site. This has no place in a conservation area and will bring only detriments to local residents. It is clear that this plan seeks to maximise profit with zero regard for the fitting legacy promised to residents by Bristol Zoological Society. To allow this, or any similar sized development, on this site would be an unforgivable error that would permanently adversely affect the whole of the Clifton Downs area.	30-Dec-22
437.	O	Architecturally Unsympathetic to the surrounding listed buildings and conservation area. Loss of trees & natural habitats. Increased pollution. Increased on-street parking pressure. Pressure on local primary school places. Insufficient 'legacy' for neighbourhood & local community. .	30-Dec-22
438.	O	Architecturally Unsympathetic to the surrounding listed buildings and conservation area. Loss of trees & natural habitats. Increased pollution. Increased on-street parking pressure. Pressure on local primary school places. Insufficient 'legacy' for neighbourhood & local community. .	30-Dec-22

439.	O	This development is not in keeping with the surrounding area. It will bring much disruption to the area both during construction but also after the proposed works have been completed. Simply put, we need to make better use of the space for the current residents of Clifton and Bristol rather than 'cramming' in as many new homes as possible. This is a bad proposal.	31-Dec-22
440.	O	Dismayed as we were by the closing of the historic zoo, as frequent visitors we believed Bristol Zoo when they explained the animals needed to be moved to the Wild Place for ecological and welfare reasons. They told us more space was needed, and welfare could be guaranteed by the money from selling the site. This would appear to be misleading propaganda as we now understand few of the mammals will be moved to their alternative site - leaving the Zoo with inexplicable desire to make tens of millions from cramming high density housing onto this site. MY OBJECTIONS ARE : I object to the scale of the buildings - 6 storeys high. They will tower over us and our beautiful Georgian and Victorian streets. We are devastated that we will be deprived of the long vistas and mature trees that we value - and so should Bristol City Planning Department. I object to the number of dwellings - this has nothing to do with Bristol's "housing crisis" - it is pure greed. I object to the overwhelming nature and BLOCKHOUSE design - if only architects been employed who had any sensitivity and aesthetic skill. In summary - these plans should never have even been conceived as they ignore the very essence of the Conservation Area and the requirement to preserve this unique cityscape - or even enhance it - BUT Not Destroy it.	31-Dec-22
441.	O	I strongly object to the proposed application. This is not what I had been led to believe would be the plan for the beautiful space of the Zoo. The removal of so many trees and the height and breadth of the proposed apartment dwellings are simply not in keeping in the Clifton Conservation Area. These proposed flats would be more in keeping in the ever-changing City Centre, but totally bulky and unattractive for Clifton, in a spot where so many birds thrive and fly around. It is overbearing and not in keeping with this beautiful site and the congestion, noise and parking etc... generated by so many tall-build flats would be unworkable.	31-Dec-22
442.	O	1. The visual impact of the proposed buildings towering over the existing high perimeter walls and neighbouring properties will be detrimental and completely out of character with the area. 2. The proposal has inadequate provision for car parking for the number of dwellings. 3. There is no certainty or clarity how long term guarantees of public access and for funding the upkeep of the gardens are to be secured in perpetuity. neighbour	31-Dec-22

443. O	<p>The revised proposals have minimal changes. The interior of the flats has been amended, but little change has been made to the heights and massing of the buildings. This is a particular issue for Northcote Road and Guthrie Road where five to six storey buildings are proposed where currently the buildings are three to four storeys high. The development does not reflect the existing architecture or the historic nature of the site and area. The number of dwellings across the site will also have a significant impact on the amount of traffic in the area and on road safety, both during the construction phase and thereafter. Whilst I understand that this is an opportunity for the Zoo to safeguard its long-term future, it is very disappointing that the proposals are less than sympathetic to their surrounds and that little consideration has been given to innovative and thoughtful design and how it can sit well within a Conservation Area. I therefore strongly oppose this development for the reasons listed above.</p>	01-Jan-23
444. O	<p>22/02737/F is going to severely disrupt this neighbourhood and add pressure to already stretched-out public services and infrastructure in this area. 22/02737/F will make acute issues such as lack of space in this neighbourhood worse. This neighbourhood already has to accommodate the influx of significant number of people during big events in the Clifton Downs. There still is no concept from the council on how to address parking space issues. The council so far has only introduced temporary solutions such as the conversion of parts of the Clifton Downs into parking space which is a disgrace and neither a green or sustainable solution to a growing issue. 22/02737/F will only add to this existing pressure. Second, 22/02737/F will cause much noise, pollution and disruption. The building site noise and pollution will affect both the immediate bordering buildings as well as the neighbourhood more widely due to the disruption to access roads. This neighbourhood already is struggling with significant noise pollutions due to frequent mass student parties. The council is aware of this issue and had to introduce a special police patrol to police unsocial behaviour. However, there are several petitions ongoing and social cohesion in this neighbourhood is already at risk. Third, pollution and stretch of public services. This neighbourhood already experiences infrequent collection of bins/recycling through council services. This is made worse due to the inconsiderate number of HMOs granted in this neighbourhood. Due to the high flux of students during terms, waste such as old furniture, mattress, kitchen utensils is laying on streets for weeks before the council is taking care of this. All together, council services are already not coping with the need. There is no sufficient consideration how council services will be expanded to accommodate the additional need of 196 residential units introduced through 22/02737/F. Lastly, the building design of 22/02737/F is not fitting in this neighbourhood as it is disproportionately big. There are many listed buildings in this neighbourhood and there is rightful concern on the damage 22/02737/F would cause to the integrity of this neighbourhood.</p>	02-Jan-23

445. O	It would be a travesty to blight this corner of Clifton with this block that is so very out of keeping with the area. From what we can see at present the development looks more like a communist prison. It is very lacking so many ways: - It would tower over all surrounding dwellings and building - It is devoid of any architectural aestheticism - The development necessitates the removal of many protected trees. This development is so far from the general mood of the country looking to build greener more environmentally spirited communities. Bristol has the opportunity to build something forward thinking, modern, green and good for the health and welfare of those living there. Let's not waste this fantastic opportunity.	03-Jan-23
446. O	It would be a travesty to build such ugly dense blocks of flats in the middle of the conservation area. The plan is so very far away from the general mood of the country aiming for greener more environmentally friendly communities to live in. These blocks are: - Too tall - Too dense - Tower over the surrounding buildings - Necessitate the removal of precious and protected trees - Architecturally devoid of any aestheticism - Visually look like communist prison block There is the opportunity to build something forward thinking, modern, environmentally friendly, good for the community and the individual people and families who live there. PLEASE let's not blight this beautiful site for many years and generations to come.	03-Jan-23
447. O	It would be a travesty to blight this corner of Clifton with this block that is so very out of keeping with the area. From what we can see at present the development looks more like a communist prison. It is very lacking so many ways: - It would tower over all surrounding dwellings and building - It is devoid of any architectural aestheticism - The development necessitates the removal of many protected trees. This development is so far from the general mood of the country looking to build greener more environmentally spirited communities. Bristol has the opportunity to build something forward thinking, modern, green and good for the health and welfare of those living there. Let's not waste this fantastic opportunity.	03-Jan-23
448. O	It would be a travesty to build such ugly dense blocks of flats in the middle of the conservation area. The plan is so very far away from the general mood of the country aiming for greener more environmentally friendly communities to live in. These blocks are: - Too tall - Too dense - Tower over the surrounding buildings - Necessitate the removal of precious and protected trees - Architecturally devoid of any aestheticism - Visually look like communist prison block There is the opportunity to build something forward thinking, modern, environmentally friendly, good for the community and the individual people and families who live there. PLEASE let's not blight this beautiful site for many years and generations to come.	03-Jan-23

449. O	Giving planning permission for housing should be denied. Bristol gardens is an historical site, which has been a much loved local amenity. Simply building houses is in direct conflict with the aspirations Bristol has as a green city. Considering all the alternatives (Eden project type, virtual zoo, city farm) all have much higher social and environmental values and would showcase Bristol as a futuristic thinking city. Building houses shows planning is stuck in old thinking. Deny the planning permission and give time for alternatives to be planned out.	03-Jan-23
450. O	Overintensive development, buildings too big and too high, not in keeping with surrounding area. Incongruous in conservation area. More traffic and parking could impact residential areas and have detrimental effect on The Downs. The plans should be completely withdrawn, not tweaked. There should be a new submission by more enlightened architects taking into account local feeling and sensitivity of the location. The heritage of the area should be valued and respected.	04-Jan-23
451. O	Although I no longer live in the BS8 area, my breath was taken away by the oppressive ugliness of the plans I saw yesterday for the re-development of the former Bristol Zoo gardens. Clifton is an area of outstanding architectural character. The proposed development would appear to be the City Council beginning the process of reducing this character in favour of cramming in nearly 200 dwellings. The development seems to turn its back on the centuries of elegance and grace, presenting a prison-like exterior to the immediate environment. Are the new residents expected to behave in a similar fashion? I do not object to the profits the developers could make but the granting of permission for them to desecrate a beautiful part of Bristol seems to me to be tantamount to vandalism.	04-Jan-23

452. O	<p>Summary of Objection The role of zoos within the UK and throughout the world has obviously changed over time from what could be considered as traditional visitor attractions, to one where zoos are now centres of learning and excellence whose function is to ensure the survival of critically endangered species. From reviewing the latest available published figures, around 500,000 people visited Bristol Zoo in 2019. Since it opened in 1836, over 90million people have passed through its gates. Families have been entertained and interacted with the animals at close quarters. They have learned about the vital conservation work that is integral to saving endangered species across the planet. However, we are of the firm belief that the closure of this much loved and respected Zoo is premature and ill judged. We believe that the proposals to convert the site into a housing scheme has been poorly conceived and designed and fails to recognise the architectural importance of the wider area. Planning Policy The site of Bristol Zoo sits within the Conservation Area of Clifton &amp; Hotwells. Clifton &amp; Hotwells was designated as a conservation area on 26 September 1972 and extended on 16 February 1977 and 18 February 1981. The Clifton &amp; Hotwells Conservation Area Character Appraisal was adopted on 14 July 2010. In exercising its planning functions in a conservation area, the local planning authority is under a duty to pay "special attention to the desirability of preserving or enhancing the character or appearance" of the area (s.72 Planning (Listed Buildings and Conservation Areas) Act 1990). Bristol's conservation areas are the subject of policies in the Bristol Local Plan as described below. The Local Plan now consists of the Core Strategy which was adopted in June 2011 and the Local Development Policies plan, which was adopted in 2014. These documents alongside the Conservation Character Appraisal form the Development Plan and all planning decisions put before the Authority should be based around these local plan policies and National Planning policy and guidance. National Planning Policy is in the form of the NPPF 2021 which provides strategic and high level guidance to Developers and Local Authorities in relation to development proposals. Specific guidance in relation to housing development and the potential impact on heritage assets is detailed within Chapter 16 Conserving and Preserving the Historic Environment. This chapter goes into more detail as to what is expected of an Applicant when submitting developments proposals and how Local Planning Authorities should measure and assess such proposal in the context of the importance of such heritage assets, eg Listed Buildings and Conservation Areas. Local Context The conservation area of Clifton &amp; Hotwells focuses upon the development of terraces, crescents and streets that rise from Hotwells in the south before meeting the open landscape provided by Avon Gorge and Clifton Down to the west and north. The area is characterised by its dramatic climb from 10m above sea level at the lowest point alongside the Floating Harbour, reaching up to 90m at the highest towards Clifton Park where Bristol Zoo is located. Bristol Zoo is surrounded by buildings that are owned and operated by Clifton College (Guthrie Road and Northcote Road) and early, mid and late Victorian, 3 storey villas that are situated along College Road and the wider urban environment beyond. The predominant built form of the immediate area surrounding Bristol Zoo area large Victorian 3 storey (plus basement) villas which are either detached or semi-detached being either two or three bays wide. These properties are set back from the pavement edge with front mature front gardens and low boundary walls. There is a very strong and prominent building line that is consistent across the area. The dominant building materials used within these building is rubble limestone, pennant sandstone and</p>	04-Jan-23
--------	---	-----------



	<p>Bathstone quoins and detailing. Windows are traditional timber sash with panelled front doors. The overall architectural style provides a strong sense of place that manages to combine residential elements along College Road with a strong and robust architectural style of Clifton College seen along Guthrie Road and Northcote Road. Figure 1 below provides an overview of the building type, context and character of the wider Bristol Zoo area. Of note and of relevance to this application is; - Blue highlighted buildings to the south of Guthrie Road - Listed Grade II - Brown highlighted buildings located along College Road and Northcote Road. These are buildings which add value to the townscape character and make a positive contribution to the conservation area. - Mauve highlighted buildings. Key unlisted buildings such as Clifton Pavilion and buildings belonging to the Clifton College along Guthrie Road and the wider educational establishment that contribute to the character of the area. Figure 1 Extract of Buildings Types surrounding Bristol Zoo. Taken from Clifton &amp; Hotwells Conservation Character Area Appraisal 2010. Of greater importance is the wider views (medium and long distance) that are found within this part of the Conservation Area. Clifton Downs is located directly to the north of the Bristol Zoo site. It rises up steeply to provide panoramic views over the Zoo, Clifton and beyond. The significance of these views cannot be overstated and Bristol Zoo as well as Clifton College adjacent are identified as a 'Landmark of City wide importance' within the Character Appraisal. Figure 3 below, provides an extract of the important views that have been considered prominent within and adjacent to the Bristol Zoo site. As can be seen many of these views look north towards Clifton Downs (L23 - L27) but equally views are equally possible looking south from Clifton Downs across Bristol Zoo, Clifton and the wider urban environment (See green crescent shape in extract below). The applicant proposes to construct a six storey high apartment block (spanning the entire width of the site), along the northern elevation, that will rise above the existing ground level by some 19.35m. By doing so it will completely obliterate existing views looking south from the Downs across Clifton and the wider environs of Bristol. See photo image (figure 2) below. Figure 2 View looking south from Clifton Down onto northern boundary of Bristol Zoo. Red Line approximately defines height of proposed apartment block The overall setting and character of Bristol Zoo is one that has evolved and developed over nearly 180 years. There are buildings within the Zoo site and along the periphery of the site that do not compliment the historic character of the area but they in most instances do not impose or detract historic integrity of overall historic importance of this area. Figure 3. Extract of Important views as described in the Clifton &amp; Hotwells. Conservation Character Appraisal. 2010. As can be seen from Figure 4 below, a clear sense of place and architectural style has been created over the development of this part of the Conservation area. This has allowed the Bristol Zoo site and the Clifton College site to form a 'hub' of larger institutional buildings that is surrounding by smaller scale but none the less, important Victorian residential buildings. These Victorian villas broadly define the east and western boundaries of the Bristol Zoo (and Clifton College) site along College Road and Pembroke Road. The open space of Clifton Downs then provides a natural 'full stop' to any development directly to the north which is bordered by Clifton Down Road. The Conservation Character appraisal states at para 6.1.4 that; The street pattern to the north of the conservation area is more regular, and sits more comfortably on a grid pattern of cross cutting streets, with the Zoo and Clifton College at their heart. The Applicant is attempting to redefine</p>	
--	---	--

	<p>the very character of the conservation area by introducing inappropriate and poorly designed residential apartment blocks that will be entirely alien to the setting of the conservation area and its setting. Such buildings will be at odds with the overall architectural layout and theme of this area that has taken almost 180 years to evolve. These monolithic apartment blocks will impose an architectural style on this area that will be completely alien to this character and setting of this area and will fail to preserve or enhance the conservation area.</p> <p>Figure 4 Extract of Land use within the Clifton &amp; Hotwells Conservation Area. 2010. Appraisal and review of the proposed design i). Comparative heights of buildings. There has been no critical analysis and discussion of the different roof heights of the proposed apartment block compared to the buildings immediately adjacent to the site along College Road, Guthrie Road and Northcote Road. There are no cross-sectional drawings to show how the proposed apartment buildings will relate to the existing buildings in height, scale and mass. If such drawings did exist, it would clearly show the disparity between the height of the proposed apartment blocks compared to the educational buildings of Clifton College and the Victorian residential villas along College Road. The apartment blocks (known as E1, E2 E3 and S1) will completely dominate the educational buildings of Clifton College, located along Northcote Road and Guthrie Road. From reviewing the proposed elevational drawings provided by the applicant, the buildings will rise up on average between 14,0m to 17,0m above ground level. It is accepted that there are ground level differences running north to south, but the overall impact of such inappropriately designed buildings being located directly opposite these handsome educational buildings will lead to a downgrading of the architectural value of these buildings and will have a detrimental impact within the conservation area. Equally and potentially of more importance is the impact on the northern block (N1 2 &amp; 3) on the listed building in the North West corner of the site. (detailed as the Clifton Conservation Hub). This unique building which is listed Grade II will be completely dominated by the construction of this new apartment block. No attempt has been made by the Applicant to review or explain this impact or show the inter-relationship between the existing heritage asset and the proposed apartment block. ii) Loss of open green space within the site Whilst it is fully acknowledged that access into Bristol Zoo is via an entry fee, the Zoo has been designated as a Local Historic Park &amp; Garden and an Important Open Space. The area provides a traffic free space that allows visitors to interact with the animals at very close quarters. The proposals would completely and totally alter the character of this area by introducing tarmaced roads, parking spaces (for 121No vehicles) and garage parking throughout the site. The sense of place would be altered from a traffic environment to a fairly standard suburban housing estate. It will resemble a gated community that will restrict access to the general public and will eventually provide communal garden areas for the sole use and enjoyment of the residents. Inevitably the lack of parking spaces provided within the scheme, will mean that increasingly cars will be parked inappropriately along the internal access roads further detracting from what is currently a pleasant green open space. There is increasing concern that despite the assertion from the Applicant that the internal green areas will be open to the public, the layout and form of the proposed scheme will completely alienate the general public from visiting this site. The newly formed entrances into the site will provide direct road access into the site from College Road, Clifton Down and Guthrie Road. The invitation</p>	
--	--	--

	<p>for the general public to explore the internal green space will not be clear and it will be increasingly seen as the preserve of the use of the residents only. This is very much at odds with the zoo's historic role as a key part of the city's green / open space fabric, reflected by its planning designation as a Local Historic Park &amp; Garden and an Important Open Space. iii). Loss of historic boundary features</p> <p>The proposals for the development of the various apartment blocks along Guthrie Road and Northcote Road means that entire lengths of existing rubble and pennant sandstone boundary wall features will need to be demolished. These stone walls range between approximately 2.5m high to about 5.0m - 6.0m high at the junction of Guthrie Road and Northcote Road. The loss of such historic features to accommodate these apartment blocks will further degrade the historic fabric of the Zoo site and will have a detrimental impact on the conservation area in this locality. Equally the construction of the apartment block running parallel to Clifton Down (northern boundary) will also mean the entire loss of this boundary wall that currently exists. The drawings do not make it clear at all whether this boundary wall feature is being retained or not. It is assumed currently that the boundary wall will be demolished. There is an equally strong boundary wall feature that exists along College Road. It is not at all clear from the proposals as to whether this 2.5m high wall will remain intact or whether this will be demolished also. Further clarification should be sought from the Applicant as to his intentions.</p> <p>iv) Enabling Development It is accepted that in some instances in order to make a development commercially viable, some alterations need to occur to listed buildings and heritage assets. This is the case for the Giraffe House and other listed buildings within the site such as the Bear Pit, the Monkey Temple and the Aviary building. The Applicant is proposing to convert the Giraffe house into residential accommodation and the remaining heritage assets will be integrated into the wider landscaping scheme for the site. However, what has not been made clear by the Applicant is the justification for such a radical change from one use to another. Paragraphs 199 - 208 of the NPPF (2021) goes into greater detail as to how harm should be assessed and whether the significance of that harm is acceptable or not. The concluding paragraph (208) is of particular significance for this application. It states that; Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disadvantages of departing from those policies. It is vital that the LPA carefully reviews the justification of harm to these important heritage assets and whether the principal of development here has been fully explained and justified. We are of the firm belief that the significance of harm that the proposals will have on the Conservation area as well as the listed heritage assets do not outweigh the benefits of the proposed scheme.</p> <p>v). Tenure &amp; Ownership The affordable housing statement (Savills, October 2022) seems to suggest that the spread of first homes and affordable rented accommodation (40 No units in total) will be evenly spread out across the site and that as a result the scheme will be 'tenure blind'. However, if one analyses the accommodation schedule that has been prepared by the applicant, it is evident that Block S1, all 30 No units within this block will be rented and managed by a social housing provider. The 10 No first homes will be spread out between Blocks E2 &amp; E3. We don't see how such a proposal will successfully integrate the different types of tenure into the scheme. It will only serve to potentially stigmatise the occupants of this apartment block (S1) and the overall housing scheme will be poorly integrated</p>	
--	---	--

	<p>as a result. vi) Loss of a Community Facility There is a clear and direct link back to the Bristol Core Strategy (2011) and the Development Plan Policies (2014) that seeks to prevent the loss of Community Facilities. The Local Plan does not precisely define what a community facility is, but at para 2.5.2 it states that community facilities can be; community centres and childcare facilities, cultural centres and venues, places of worship, education establishments and training centres, health and social care facilities, sport and recreation facilities and civic and administrative facilities. It may also include other uses whose primary function is commercial but perform a social or community role i.e. sport, recreational and leisure facilities including local pubs. Both Local Plan policy DM5 and Core Strategy Policy BCS12 make direct reference to the fact that the loss of Community Facilities will not be permitted unless it can be clearly demonstrated that there is no longer a demand for the facility or that the building/s are no longer suitable to accommodate the use and the building cannot be retained or adapted to another community use. Furthermore Policy DM5 goes onto state that the loss of a community facility will only be acceptable if a replacement facility can be provided in 'a suitable alternative location'. The location of the Wildplace Project is in a location (off Junction 17, M5) that will require visitors to arrive via car or other motorised transport. The site is totally inaccessible to people without the means of a car. The appeal of the Bristol Zoo site is that it is centrally located and it is accessible via bus or by foot or by bicycle. We would strongly argue that the Applicant has not fully and sufficiently demonstrated that the alternative uses of the Zoo as a community facility has been fully and carefully explored. There has been no critical analysis and explanation as to whether the buildings and the site as a whole can be enhanced, adapted or whether a mixed use scheme could be introduced in order to keep the Zoo site operating as a commercial concern in its current location. The Zoo has played a crucial and integral role in the local community for the past 180 years. The Applicant appears to be ignoring the very strong relationships that have developed over this period between the local community and the zoo and is basing decisions about the future of this facility purely on commercial and financial objectives. Scant regard has been paid as to the potential impact that the closure of this facility will have on the local community and its potential replacement in a total unsustainable location that can only be accessed if families or individuals have a car. Conclusions The City of Bristol Local Planning Authority have a legal duty which is clearly set out in the Listed Buildings &amp; Conservation Act. The LPA must have special regard to protecting listed buildings and the character and appearance of conservation areas. They must ensure that the setting and context of these important heritage assets are duly protected, preserved and enhanced. The NPPF (2021) places considerable weight on ensuring that these important heritage assets are duly protected and requires Decision Makers to pay due regard to ensuring that such assets are not negatively impacted by development proposals. LPAs are clearly advised that they should refuse planning permission if the impacts of a development outweighs the benefits of such a proposal. (ie the delivery of housing units). Overall the proposal that has been submitted by the Applicant for consideration does not preserve or enhance either the character or appearance of Clifton &amp; Hotwells conservation area. The impacts on the various listed heritage assets (within and adjacent to the site) have not been fully justified and explained. The benefits of the proposal do not outweigh the impacts on these important buildings as defined above. The loss of green open</p>	
--	---	--

	<p>space within the site is of great concern and the proposals put forward provide no evidence that this space would be guaranteed for public use in perpetuity. We would recommend that your officers recommend refusal of this application and urge you to support our objection of this application. Both Local plan and National planning policy provide a clear route to substantiating a refusal of planning permission. Notwithstanding the above we have outlined below a number of reasons for refusal which we believe are relevant and pertinent to this application. Reasons for Refusal The proposed development due to its insensitive design, form, scale, positioning and due to the loss of original fabric, would fail to respect the existing special character and historic significance of the listed building. It would also harm the character and appearance of Clifton &amp; Hotwells conservation area. The harm is not outweighed by adequate public benefit and therefore the proposal is contrary to the NPPF, adopted Policies BCS21, BCS22, DM26, DM30 and DM31, Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant guidance from SPD2 - A guide for designing house extensions and alterations. The proposed development at roof level would impose visual disharmony and the impact on the adjacent educational and residential buildings. The change in building height would be particularly noticeable when viewed from Clifton Downs and would undermine the appearance of the Conservation Area thus failing to accord with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposed works would amount to substantial harm, it is considered that there are insufficient public benefits associated with the development and would therefore fail to accord with the requirements of Paragraph 202 of the NPPF and Policies BCS22 - Conservation and the Historic Environment of the Bristol City Council Core Strategy (adopted June 2011) and DM31 - Heritage Assets of the Bristol City Council Site Allocations and Development Management Policies Document (Adopted July 2014) and is therefore unacceptable. By virtue of its siting, scale, form, mass and overall design the proposed development as currently designed would therefore appear as an unsympathetic and overly prominent addition in this setting, failing to preserve the character of the established street scene; this part of the Clifton &amp; Hotwells Conservation Area or the setting of surrounding Listed Buildings. Accordingly, the proposal conflicts with Section 16 of the National Planning Policy Framework (2018); Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990; Core Strategy (2011) Policies BCS21 and BCS22 and Site Allocations and Development Management Policies (2014) DM26, DM29 and DM31. The Applicant has failed to suitably demonstrate that the loss of this important community facility is justified. The evidence put forward does not provide sufficient justification as to why this community facility has to close and why an alternative or more suitable appropriate use cannot be found in this location that would allow the site to be utilised and be maintained as a community facility for the longer term. Core Strategy (adopted June 2011) Policy BCS12 and Site Allocations Development Management Policies DM5. (Adopted July 2014) and is therefore unacceptable.</p>	
--	---	--

453. O	<p>As a Clifton Resident, I am firmly against this proposal at Bristol Zoo Gardens. We recently moved to the areas from London and the main attraction to the Clifton area was its history, period architecture and the green urban area (not easily seen in any major UK city these days). This proposal is completely incongruous with the rest of the area and would significantly detract from the desirability of living in Clifton. I am concerned with further lead to drop in house prices in the local area. I struggle to see why building an eyesore in our beautiful city would be in keeping with the ambitions for our city. Additionally, I am concerned about the height of the building 60ft taller than the existing perimeter wall. This again seems wholly unacceptable and unnecessary, and would result in significant loss of open sky and mature trees. The destruction of so many mature trees completely contradicts Bristol's ambition to decarbonise the city, as can be seen through the introduction of the low emission zone. To tax high emission cars and build this monolithic and uninterrupted structure makes no sense whatsoever. Profit should NOT be the driving factor of this development, but should sympathetically maintain the character of the area. Our son attends Butcombe Nursey, which is on Gutherie Road and the proposed development would not only be extremely disruptive to his time there (traffic / noise pollution / atmospheric &amp; dust pollution), but also the proposed developments, in the long term would overshadow the nursery and children's playground. Concerned Clifton Neighbour, David Raspin</p>	04-Jan-23
454. O	<p>This proposal is totally unsatisfactory. It is proposed that the site, in a historically important part of Clifton, is sold for maximum financial gain, to develop a facility outside Bristol. The scale and unattractiveness of the residential properties are totally out of keeping with the area. There will not be any social housing included. Already, the West car park development seems to be going ahead, despite overwhelming objections. If this plan is accepted, it will be a disgrace, revealing a lack of appreciation of aesthetic importance in such a sensitive area. Residents of Clifton, greater Bristol, and the wider region, will live with any development for centuries. Planners should support something that everyone, including the zoological society, can be proud of. The current proposal is not in that category. Any largely residential application should be turned down.</p>	05-Jan-23
455. O	<p>1. Please do not allow random and unsuitable housing or other use on this beautiful site. Our city is rightly proud of this historic neighbourhood. I feel the proposals are not in keeping with the surroundings. 2. We should use existing empty premises for converting into accommodation, not open, green sites. 3. I am not persuaded that the site is not viable. Living along the road, I see the queues of people waiting to get in, experience the build up of traffic on beautiful days, when families are taking their children to the zoo. Many of those families will have limited access to green space. The zoo gives them the opportunity to run around, to learn about our precious wildlife and the importance of protecting our environment. Please don't let an ever increasing desire to make money take this away from those families.</p>	05-Jan-23

456. O	<p>I object both to the zoo being closed and to the highly inappropriate planning submission currently being proposed. The zoo site has a massive historical value, which will be mostly destroyed if the present proposal were to be approved. The public have had the right to access these area of historical importance for generations. After so long, there is surely a legal right for all individuals to retain that access. The proposed plans are totally out of keeping with the beautiful Clifton historic architecture, most especially Clifton College and surrounding Victorian townhouses. Also, the proposed buildings are far too high and of a poor architectural design. The Zoo itself seems to still be a viable business and there seems to be no reason why it should not remain so. Let's not put individual financial gain ahead of the chance to save such an important and historical site for the benefit of all.</p>	05-Jan-23
457. O	<p>1. Harm will be caused to overall historic interest. The Zoo has been on the site for so many years yet all this will be overridden. 2. Loss of communal value to a site that Bristolians and others have visited for generations. 3. Harm will be caused to listed buildings. There are a number of listed buildings and gates on the site, but all buildings will be turned into apartments. These buildings will be changed and become unavailable to the public. 4. Unjustifiable harm will be caused, the 'oasis' that the Zoo gardens provide being lost forever. 5. Change of use not proven. Bristol Zoo has not proved that it cannot continue as a public site. Its business case is unclear. Alternative uses remain unexplored. 6. Loss of public amenity. In similar cases green spaces have become private. 7. The proposed buildings are completely out of scale with the surrounding buildings, and are not in harmony with the Clifton College buildings or nearby houses. A huge monolithic block will rear its ugly head facing the Downs. 8. Loss of landscape. Almost 50% of existing trees will be lost; many more will be damaged. The public green spaces will be small. 9. The area may well lose its treasured conservation area status as a result of such a huge housing estate being built. This would be a tragedy for all Bristolians.</p>	05-Jan-23
458. O	<p>I am really shocked that such a wonderful communal resource might be going. Being in the inner city, it is easily accessible to many people and has always been such a wonderful place for families and children. Bristol Zoo is Iconic..it is a site of great significance and is of Historic interest. The proposals involve a loss of landscape..reducing the public green space and losing trees. It has listing as a local Historic Park and Garden and is an Important Open Space. I cannot believe that the Council would allow a proposal which reduced any of these wonderful Zoological Gardens and allow building on any of the site. Please refuse this application for the many families who now have been enjoying this very special place, and to ensure that it remains for future generations. Thank You.</p>	05-Jan-23

459. O	Comments on behalf of Mall Gardens Residents Association: - Loss of Heritage - loss of a major public amenity for Bristolians which has enriched the lives of generations for over 150 years. The retention of the area as a public amenity in perpetuity is at risk. - Scale - large blocks of flats some as high as six stories are entirely out of keeping with the character of the area, which is a key conservation area. They are over intrusive and of poor architectural merit. - Aesthetics - high density accommodation which threaten the heritage asset of the gardens. More time is needed for the development of ideas and broader thinking on the future of the site (eg Eden Centre, RHS)	06-Jan-23
460. O	The scale of the large blocks of flats are out of keeping with the character of the Clifton conservation area and the surrounding listed buildings. They are over intrusive and lack architectural merit appropriate for such a key and iconic site This is a historic and heritage site The development will result in the loss of a major public asset and amenity, potentially in perpetuity. The gardens are an integral part of the open spaces and inherent character of the Clifton area. The high density accommodation threatens the aesthetics and heritage asset of the site and gardens in particular. More time is needed for development of ideas, wider consultation and broader thinking on how the unique aspects of the site could be protected in the immediate and long term.	06-Jan-23
461. O	Comments on behalf of Mall Gardens Residents Association: - Loss of Heritage - loss of a major public amenity for Bristolians which has enriched the lives of generations for over 150 years. The retention of the area as a public amenity in perpetuity is at risk. - Scale - large blocks of flats some as high as six stories are entirely out of keeping with the character of the area, which is a key conservation area. They are over intrusive and of poor architectural merit. - Aesthetics - high density accommodation which threaten the heritage asset of the gardens. More time is needed for the development of ideas and broader thinking on the future of the site (eg Eden Centre, RHS)	06-Jan-23
462. O	The scale of the large blocks of flats are out of keeping with the character of the Clifton conservation area and the surrounding listed buildings. They are over intrusive and lack architectural merit appropriate for such a key and iconic site This is a historic and heritage site The development will result in the loss of a major public asset and amenity, potentially in perpetuity. The gardens are an integral part of the open spaces and inherent character of the Clifton area. The high density accommodation threatens the aesthetics and heritage asset of the site and gardens in particular. More time is needed for development of ideas, wider consultation and broader thinking on how the unique aspects of the site could be protected in the immediate and long term.	06-Jan-23



463. O	<p>While I am in favour of building more housing in Clifton, and I think the former zoo is a great site for it, I cannot support the plans for this development as they are. Although there does appear to be a lot of central green space, the 6-storey high walls surrounding the development are clearly designed to make the development feel exclusive and unwelcoming to outsiders or non-owners of the apartments, and are not at all in keeping with the rest of the area. The aerial view clearly shows that most of the apartment blocks dwarf the existing buildings of Clifton college, which are a gem of Clifton. The north view from Clifton down, which currently has a pleasing aspect of greenery will now be met with an imposing solid wall 25m high and 300m long, reminiscent of a London prison. The colours of the walls, although pleasant in the proposed drawings, will not be nice for long, and will stand out for all the wrong reasons in the future when they are dirty. In a development of this size, keeping the outer facade of the buildings clean and tidy will not be a priority. The buildings are just designed as square blocks with a few embellishments, to make them slightly more interesting, but all of the buildings in the surrounding areas have pitched roofs and stone facades. I also hope that the proposed 6-storeys will not be allowed, since there are no buildings in the local area which are higher than 4-storeys, except for Clifton college, which should be able to stand out from the development right next to it.</p>	07-Jan-23
464. O	<p>The NPPF Guidance states, para 189 "These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance for the enjoyment of future generations." Blocks of luxury flats do not fit this bill. The Trustees took this hasty and incomprehensible decision at a time of national stress, the lockdown. One of the justifications for selling the zoo is apparently financial, yet for the last nine of the ten years prior to the Covid closure, there were never less than half a million visitors. It can thus be considered as being financially viable, even if current management requires changes. On heritage grounds alone therefore the zoo should be preserved. 150 years as one of Bristol's premier public assets should not be casually disregarded as is currently to be assumed if this proposal is accepted. On aesthetic grounds, the brutal scale and style of the proposed luxury flat buildings would be quite out of place in the context of the listed buildings which characterise Clifton. This proposal should be rejected to give Bristolians time to grasp the nature of this move and to understand the nature and scale of the loss that their children will suffer.</p>	07-Jan-23
465. O	<p>I strongly object to this monstrosity of a development. It is not in keeping with the historical fabric of the area. For this to be even showcased to the public shows how out of touch the Council planning are. This development should be shelved. Also to add the removal of mature trees is an outrage. I thought we had a Councillor/Lord Mayor who was supposedly 'Green'. I trust she is objecting to this as well.</p>	08-Jan-23

466. O	I strongly object to this monstrosity of a development. It is not in keeping with the historical fabric of the area. For this to be even showcased to the public shows how out of touch the Council planning are. This development should be shelved. Also to add the removal of mature trees is an outrage. I thought we had a Councillor/Lord Mayor who was supposedly 'Green'. I trust she is objecting to this as well.	08-Jan-23
467. O	We are writing to object in the strongest possible terms to the proposed development of Bristol Zoo's main site. As long standing residents of Clifton, we are deeply concerned that the historic character of the conservation area will be permanently blighted by this development. For all of the green washing that the Zoo and its partners may put in place, the development is essentially a housing estate. It will be totally out of keeping with its surroundings, overshadowing the streets around it and acting as a magnet for congestion. No amount of tweaking can ameliorate the grotesque nature of this development. We have serious doubts as to how accessible the zoo gardens will be in the future if they are turned over to residential use. We are aware that there are competing proposals for the use of the site which may be of far more use to the local community than providing overpriced apartments in a gated community for the privileged. Bristol City Council should think about the needs of the local community which they serve as opposed to letting the zoo dictate what should happen because of its alleged financial difficulties.	09-Jan-23

468. O	<p>Comments: I would like to raise three further objections to those already raised:</p> <p><b>Economic Benefits</b> The comment from the Council's Economic Development team - to the effect that "the Economic Benefits Assessment document represents a reasonable estimate of the potential economic benefits of the proposal" - cannot be taken seriously. The document is not balanced and does not follow - as the report claims - HM Treasury Green Book Guidance for reasons I have set out in my previous objection.</p> <p><b>Carbon Factors</b> The Council's Sustainable City team have commented: "As SAP 2012 carbon factors were in use for Part L 2013 at the time of the initial submission, the use of these carbon factors has been continued for the revised statement (rather than Part L 2021). For the purpose of BCS14 calculations we consider this to be acceptable" The same applicant was recently awarded consent on the West car Park site. That application (21/01999/F) was submitted long before this application (22/02737/F). In a September 2022 revision to the Energy and Sustainability Statement accompanying the application 21/01999/F, the applicant's consultants, Hydrock, updated the carbon factors used in the calculation of the residual CO2 savings from the proposal from Pat L 2013 to Part L 2021. the comment from the Sustainable Cities team seems to indicate that the Council would find it acceptable under the newer application to make use of the older carbon factors. The Council's position should be considered in the light of the rather obvious point that it cannot be for the applicant to pick and choose the carbon factors which suit its purpose of seeking to demonstrate compliance with extant policy, still less, for the Council to consent to the wishes of the applicant when it is clear that the basis for the calculation has changed. To put this another way, the Council is sanctioning an approach to the calculation of carbon savings from renewable electricity generation which have not been reflected in the carbon intensity of generation for more than ten years. It is obviously out of date. It is incredibly disappointing to see a Council that has declared a climate emergency seeking to ease the path of an application based on endorsing the use of carbon factors that are completely divorced from prevailing reality. This view is unacceptable and must be changed.</p> <p><b>Affordable Housing</b> As regards affordable housing, the Applicant's Planning Statement (from Savills, October 2022) states: "Application Policy BCS17 state that affordable housing will be required in residential developments of 15 or more dwellings. A minimum of 40% provision is sought in Inner West Bristol, subject to viability, although the Affordable Housing Practice Note (April 2018) allows a 20% provision subject to meeting the required criteria. The tenure, size and type of affordable units will reflect identified needs, site suitability and economic viability". Currently, the Council is likely to exceed targets it set for building new homes, but will fail to meet its target for affordable homes. The approach in the Affordable Housing Practice Note (AHPN) seemed inconsistent with a sincere attempt to deliver the required number of affordable homes. The AHPN does not form part of the statutory development plan. New policies cannot be set out in the Affordable Homes Practice Note, so the Core Strategy policies would remain the locally relevant ones. BCS17 in the Core Strategy states: Affordable housing will be required in residential developments of 15 dwellings or more. The following percentage targets will be sought through negotiation: - 40% in North West, Inner West and Inner East Bristol; - 30% in all other locations It would be extremely difficult, in the circumstances, to argue that 20% affordable homes is the outcome that would have resulted under the extant policy BCS17. If that is not the case, then it would be reasonable to argue that the AHPN had</p>	09-Jan-23
--------	--	-----------

	<p>materially influenced the policy in ways that it cannot do. There is a general understanding (it is a matter of public record) that the applicant seeks to sell the land to generate revenue in support of its objectives. It is not the role of the Council's planning function, or the development control committee, to facilitate the achievement of a higher value for land than might otherwise be the case. In the context, therefore, and recognizing that there is likely to be sufficient residual value in the land value to justify a higher proportion of affordable homes, then if consent were given to the proposal, it would be difficult to argue that the AHPN had not given rise to a material change in the application of the extant policy on affordable homes, BCS17. The 20% affordable homes offered by the applicant a) is inadequate, and b) has been arrived at in a manner that is inconsistent with the application of BCS17.</p>	
--	---	--

469. O	<p>The Planning Statement from Savills makes much of the context in which the application is made, in particular, the situation that Bristol, Clifton &amp; West of England Zoological Society (BCWEZS) finds itself in. It also makes much of the economic impacts, as well as the supposedly sustainable nature of the proposal. Background The economic plight of the Zoological Gardens site is significantly of BCWEZS's own making. The publicly available Annual Report and Financial Statements for BCWEZS, made up for the year ending December 2019, reported on the 2020-2025 Strategic Plan. Included in the Plan were: - "Capital investment at both Bristol Zoo gardens and Wild Place Project"; and - "...a clear long-term vision and masterplans for both Bristol Zoo Gardens and Wild Place Project. Bristol Zoo Gardens transformed by the time of its bicentenary in 2036. Wild Place will continue to grow into an even greater wildlife adventure, while Bristol Zoo gardens will place a greater value on visitors' interactions with and understanding of individual animals. The Report and Financial Statements in the same document then reported that the closure of both sites as a result of the coronavirus pandemic was impacting on this strategy. It noted: Following the Coronavirus pandemic and the financial implications arising from the closure of both sites from 21 March to 19 June 2020 for Wild Place Project and 14 July for Bristol Zoo gardens, the Trustees will be reconsidering this strategy and the Society's ability to raise the capital needed to implement the planned major capital development projects. .... It will take time for the longer term implications for the Society to be more fully understood and the impact on its future longer term strategy. This will be the main objective for 2020 alongside the continued focus on ensuring both sites operate safely for our employees, visitors and animals and the implementation of cost saving initiatives. Note the wording here - reconsideration of the strategy was supposedly to follow, and not precede, the pandemic. The reported financial performance for the year was not at all suggestive of impending financial meltdown, though alarm bells were being sounded, as would have been prudent in the circumstances. The Report contains a Report of the Trustees, which was approved by the Board of Trustees, and signed off by its Chair on 24 September 2020. The accounts were signed off by the accountants on the 6th of October by the auditor acting on behalf of BCWEZS. Nonetheless, around two months after the Trustees Report report was signed off, at the end of November 2020, the Zoo reported that it was closing the Clifton site altogether, relocating to the Wild Place Project site in South Gloucestershire. Bristol Post reported: The new Bristol Zoo will offer spacious, modern facilities, significant growth in conservation and education work and a ground-breaking, innovative visitor experience, said a Bristol Zoological Society spokesperson. [...] The plans have been announced after the second lockdown forced Bristol Zoo Gardens and Wild Place Project to close, after months of closure during the peak spring and summer months. Although BCWEZS has been keen to draw links between the closure of the Clifton site and the pandemic, there is more than a suggestion that this has provided a somewhat convenient way for BCWEZS to give a decision that had been considered for some time a softer landing. This is because the visitor numbers at the Zoo site in recent years appear to have been negatively affected by the growth in visitor numbers at Wild Place Project, which BCWEZS also owns. Although what was written in the Annual Report and Financial Statements for the year ending end of 2019 gave no clear hint of this, as the Planning Statement for the West Car Park notes: A formal submission for pre-application request was made to Bristol City Council in March 2020. The proposed development submitted for pre-application</p>	09-Jan-23
--------	---	-----------

comment related to a scheme for 78 dwellings (no affordable housing provision and a proposed density of 153 dph) and the buildings proposed ranged from 2-4.5 storey plus semi basement parking. It is clear, therefore, that well before the Report and Financial Statements for year ending 2019 were signed off, and in advance of the first lock-down linked to the Covid-19 pandemic, BCWEZS was exploring the option of developing the West Car Park. It is not entirely clear, therefore, that plans were not already afoot to sell the Clifton site well before the effects of the pandemic became known. Chris Booy, Vice Chair of Trustees, in his written statement regarding the Zoo's application on the West Car Park, noted: In late 2020, Trustees of Bristol Zoological Society voted unanimously to relocate Bristol Zoo to the Wild Place Project site. [...] This decision followed an extensive process to explore a number of options, as well as taking independent professional advice. It seems clear that preparatory work to inform the decision had been underway for some time. It is a little surprising that the Trustees Report remained silent regarding the preparatory work ongoing, including the pre-application submission to Bristol City Council. The Charity Commission's Guidance on preparing a trustees' annual report indicates: If your charity's income is more than £500,000 you also need to: - explain your strategy for meeting its charitable purposes - list any significant activities you undertook as part of this strategy - give details of what your charity achieved in carrying out these activities to meet its purposes The omission, in the Report, of any mention of the pre-application submission, or other work underway at the time, is an omission in the Trustees' explanation of their Strategy. In a video purporting to explain its decision, the CEO, Justin Morris, reports that there has been a 'significant decline over many years' in visitor numbers. The evolution in visitor numbers at the Clifton site has, between 2008 and 2019 (we have excepted the 2020 year for fairly obvious reasons) exhibited a downward trend overall. This is true for both total visitor numbers and paying visitors. The former exhibits a compound rate of decline of less than 1% per annum, the latter, a slightly higher compound rate of 1.4% (see Figure 1). Figure 1: Evolution of Visitor Numbers over Time, 2008-2019, Zoo Gardens Site Source: all data are from previous versions of the BCWEZS Annual Report and Financial Statements Neither of these rates seems 'precipitous', though equally, that they were happening would have been risen to consider additional forms of income generation and / or a change in the nature of the visitor experience, as mentioned in the Report and Financial Statements. The picture is rather different, though, if one looks only at the period before the Wild Place Project was up and running. In the period from 2008-2013 (2014 was the first full year where WPP was in operation), there is no obvious downward trend in visitor numbers at all (see Figure 2). There is no clear increase either (there is, possibly, for the paying visitors). Figure 2: Evolution of Visitor Numbers over Time, 2008-2013, Zoo Gardens Site Source: all data are from previous versions of the BCWEZS Annual Report and Financial Statements The main period of decline in visitor numbers at the Clifton site coincides with the opening of WPP, and the increasing number of visitors choosing to visit there over time. This must have been foreseeable: a competing (even if run by the same entity) attraction of a similar nature to an existing one would be expected to draw some visitors away from the existing attraction. Indeed, as WPP visitors have steadily increased, it might be considered somewhat surprising that visitor numbers at the Clifton site held up as well as they did (see Figure 3). Figure 3: Evolution of Visitor Numbers over Time, 2008-2019, Zoo Gardens Site and WPP Source: all data are from previous

	<p>versions of the BCWEZS Annual Report and Financial Statements If BCWEZS wanted to maintain visitors at the Clifton site, establishing a competing attraction was a strange way of seeking to achieve that. Since 2013, total visitor numbers at the Zoo site have held up rather better than the number of paying visitors at the Clifton site: whilst the former have declined by 1.3%p.a. in the period up to, and including, 2019, the latter have fallen by 2.6% p.a. over the same period. In Chris Booy's statement referenced above, he noted that the decision was linked to operating losses in recent years, coinciding with the opening of WPP: The decision to relocate after 185 years of memories was not taken lightly, but after making an operating loss in four of the last six years, we had to move forward to safeguard the future of the Society. It might be considered, therefore, that decisions of the Zoological Society's own making have been at least partially responsible for its worsening financial performance. There was also a statement made to the effect that the relocation to WPP would enable 'millions more people to enjoy the magic'. The 2035 vision for the zoo sets out a target regarding visitors. By 2035, the aim is to: 'Engage and connect with more than 800,000 visitors and members per annum.' In 2019, across the Clifton site and WPP, there were 830,000 visitors (see Figure 3), or more than the target for WPP to achieve by 2035. The implication is that by 2035, the main effect of a strategy that achieves the 800,000 targets will have been a net transfer of the half a million or so visitors at the Clifton site to WPP. The potential environmental consequences of each scenario are explored below. The suggestion that the new zoo site will have, in the words of the Chair of the Trustees, Charlotte Moar, 'conservation and sustainability at its heart' is questionable. Indeed, BCWEZS's strategy looks like the antithesis of what an entity concerned with wildlife would do, recognizing that - as BCWEZS well knows - one of the major threats (if not the major threat) to species extinction comes from climate change (see below). Although this preamble may seem of limited relevance, it does need to be recognized that Development Management Policy DM31 (see further below) requires that: Where a proposal would affect the significance of a heritage asset, including a locally listed heritage asset, or its wider historic setting, the applicant will be expected to: i. Demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; Given that BCWEZS's decision have been responsible for the drop off in visitor numbers at the Clifton site, then it might have been expected to take 'all reasonable efforts' to sustain the existing use (including, presumably, by closing WPP, or by rationalizing the use of each site according to suitability for key species). The application has not demonstrated that this has been done. Economic Benefits If applicants make claims for their proposal that are obviously unfounded, it is important that these are highlighted. The report by Savills - 'Economic Benefits Assessment' - is blatantly lopsided as an exercise in economic assessment, whilst also being riddled with errors and judgements of a questionable nature. Officers and Councillors are at risk of being seriously misled by this report. The report claims that: The assessment of economic benefits follows guidance from the Homes and Communities Agency Additionality Guide (HCA, 2014) and HM Treasury's Green Book (2020). This report does not, though, follow the HM Treasury's Green Book: if it can be said to have done so, it does so selectively and in a uniquely biased manner. The Treasury's Green Book would have required external costs and benefits to have been included in any assessment. These are genuinely public costs and benefits</p>	
--	--	--

	<p>and might have a central role in determining whether the harm to heritage assets is justified. Because no attempt has been made to identify any external costs (because the assessment fails to respect the guidance it claims to have followed), it could not reliably be determined whether the harm to heritage assets was justified. Without a proper appraisal of these matters, attaching monetary values as per the HM Treasury Green Book Guidance (including Supplementary Guidance), the Council cannot possibly determine whether the harm to heritage assets is justified. Nonetheless, we should explore the claims made further. The assessment suggests the reference case for the assessment is as follows: The reference case for this assessment is the site in a vacant state once the Bristol Zoo moves to its new home. We can compare this with the words in the Addendum to the Transport Statement from Peter Evans Partnership related to the same application: Bristol Zoo Gardens closed to members of the public in September 2022, after the submission of the planning application. However the zoo use remains the permitted use for the site. Therefore consideration of this use and the associated traffic generation in the baseline position as set out in the Transport Statement for the scheme remains appropriate. The Planning Statement sets out a range of benefits which are attributed to the application. 5.75. What is abundantly clear is that, while the nature of the movements may be different as the site moves from being a tourist attraction to a residential/community use, overall there will be a significant reduction in movements associated with the proposals (DM23 states that development should not give rise to unacceptable traffic conditions). 5.76. It is also relevant to note that it is understood that in excess of 85.5% of visitors to the zoo currently travel by private motor car, while the application proposals not only seek to reduce total movements, but also to encourage alternative modes of transport. [...] 5.82. Residents will not be eligible for residents parking permits and so, in comparison with the existing tourist use where there would be significant use of the pay and display on-street parking, it is anticipated that there will be a significant reduction in parking demand on surrounding streets. It is clear from the above that all the transport impacts are assessed against a baseline of the Zoo operating as an open visitor attraction, whilst the economic assessment assumes a baseline where the site is vacant. If the site was to be treated as an operating visitor attraction for the purposes of assessing transport impacts, why would the economic assessment take a completely different baseline as the basis for the assessment? It doesn't really matter which one believes is more relevant - given the site is, de facto, not open for business, then it seems difficult to sustain the fiction that it is still occupied. Either the claimed transport benefits are not as they are, or the claimed economic benefits are not as they are. The applicant is guilty of choosing multiple different baselines to suit whatever case it is seeking to make in a given document. A clear view is required on how assessment should proceed. Is it the Transport Statement or the Economic Assessment which is wrong? The approach to appraising the impact of the proposal is clearly not consistent across the application. Claimed Additional Homes The social and economic benefits of the site include a suggestion that the 196 additional homes are to be included as a social and economic benefit. There are relevant questions to be considered as to whether these homes are genuinely 'additional'. The Planning Statement is clear enough on the need for new dwellings due to a 'shortfall': BCC published its Five Year Housing Land Supply Assessment 2020 to 2025 in June 2021, which confirms that the Council cannot demonstrate a five year supply of deliverable housing</p>	
--	--	--



	<p>sites. It confirms that the council only has a 3.7 years supply of housing land. The statement also confirmed that BCC is failing to deliver sufficient homes against the Housing Delivery Test, at 72% of the delivery requirement. The administrative area of Bristol is, therefore, in need of significant new residential dwellings to address the shortfall. The claim that the homes which are proposed will be additional raises questions regarding the counterfactual. If there is a shortfall against existing policy requirements, then it becomes more difficult to argue the 'additionality' case. Can it be argued that these houses are additional to what would otherwise be supplied when a) there is a shortfall against targets, and b) where growth in construction activity is limited by a shortage in availability of labour? If the homes were not developed here, the shortfall might, after all, equally be met elsewhere, though ultimately, the pace of delivery of dwellings may be constrained by the availability of suitably skilled labour. Employment Claims In respect of employment, the Assessment claims: The proposed development would generate more jobs, economic activity and revenues to the local government than the reference case which is the vacant site once the Bristol Zoo moves to its new home. The economic benefits include 125 on and off-site construction jobs during the 3-year construction period for residents of Bristol; 54 on-site jobs during operation (including people working from their home) Proposals such as this will not generate new 'jobs' in construction. The employment market across the UK is currently tight, and it is especially tight in construction. The Construction Skills Network suggests that there will be an additional quarter of a million workers required between now and 2026 (it is not entirely clear where they are expected to come from). The likely impact of this proposal is to contribute to overall construction activity, the pace of delivery of which may be constrained by the availability of sufficient workers with the relevant skills. The net effect of the proposal is likely to be, at the margin, to slow down the pace of delivery of everything else. The figures for the on-site jobs are even less defensible than those for the construction sector. The Assessment states: Once operational, the proposed development could generate up to 54 on-site full time equivalent (FTE) jobs upon completion based on the employment densities for each use class within the proposed development, including 41 homeworkers.<sup>5</sup> The estimate for the numbers of homeworkers who will reside on-site is based on the ONS estimates of homeworkers as a percentage of working age residents in the South West<sup>6</sup> and applying that on the household level. What this is identifying is - based on ONS estimates - how many of the residents at the site might be home workers. In order for it to be correct to claim the site might 'generate' these homeworking jobs, it would also have to generate the people. These are people who do not spontaneously emerge once the site is built: they do already exist. Nor does the development spontaneously create (anywhere) opportunities for homeworkers at the site. To attribute these jobs to the site is not credible. There may be some employment attributable to the development in terms of staff at the café, office and community hub, but one also needs to consider the relevant counterfactual. There might be some additional spend (relative to what would have occurred anyway) but much (not all) of it is likely to be 'displacement' of spend that would have occurred elsewhere. All this assumes that the appropriate counterfactual is a vacant site - if one took the view adopted in the Transport Assessment - that the baseline is a still functioning Zoo, then even on the methodologically flawed grounds that the employment claims are made, the change at the site would look very different. In summary, the claimed</p>	
--	--	--

	<p>employment generation is unsound. New Expenditure Similar comments can be made regarding 'new expenditure' by residents. The assessment makes the following assumptions: To estimate the additional expenditure from new residents, we take the average household expenditure for convenience goods, comparison goods and food and beverages as detailed in Table 2.6. We multiply the expenditure by the respective retention rates to estimate how much of this expenditure is retained in Bristol City's retail and restaurant units. We then multiply the result by the 196 additional households in the proposed development. This calculation gives an estimate of the weekly residential expenditure which is then multiplied by 52 to estimate the yearly expenditure. We estimate that the expenditure that would be retained in the local authority area to be approximately £1.5m per annum. The residents will not be 'new people' (other than any new-born children). They already exist somewhere, and they spend money. Correctly considered, the expenditure is likely to imply displacement of expenditure that would have occurred elsewhere (unless the occupants already live nearby, in which case, their expenditure patterns may be similar). It would be difficult to justify, however, attributing any additionality to this spend. Some incremental uplift might be attributable to the café simply because of its proximity to residents. This assumes, of course, that the appropriate counterfactual is a vacant site - if one took the view adopted in the Transport Assessment - that the baseline is a still functioning Zoo, then even on the methodologically flawed grounds that the 'spend' claims are made, the change at the site would look very different. The Assessment goes even further than this: 2.5.3. This additional expenditure is expected to support additional jobs in retail and food and beverage. Using average turnover per employee in these sectors we estimate that this will support 13 jobs for residents of Bristol, which are accounted for in the multiplier effect outlined in Table 2.5 above.</p> <p>2.5.4. Additionally, expenditure from new residents living at the Proposed Development would support employment in local shops and businesses in Bristol City. Again, it is very difficult to justify a view that the jobs supported would be 'additional'. The point at para 2.5.4. seems to be double counting the effect described in 2.5.3., which itself is not genuinely additional. GVA The Gross Value Added (GVA) calculations are effectively run off the employment assumptions discussed above: Gross Value Added (GVA) is an indicator of wealth creation by measuring economic activity associated with the operations in the development proposal. This section outlines the estimated GVA benefits which would be generated compared to the reference case. We have based our estimates based on GVA generated per worker in the South West region<sup>7</sup> and the number of operational jobs created by each use type presented in Table 2.3. The proposed development scheme is estimated to generate £1.6m per annum. Given the questionable basis for the employment figures claimed in the report, then it follows that the claimed GVA figures are also unsound. There are other reasons, though, why the GVA figures are unlikely to be attributable to this site. This may seem counter-intuitive, but it comes back to the question of the relevant counterfactual: if this scheme were not given the go-ahead, would the same level of GVA be generated from construction across the year? If the labour market were not so constrained, then it might be possible to claim the GVA as 'additional', especially in conditions where the consenting process for housing was such that rates of build were in excess of what was required by Government (there was clear scope to argue that the development was 'additional', in the sense of being above levels required by Government policy). Neither is true in</p>	
--	--	--

	<p>this case. Construction-related GVA will not be affected by what in the UK context is a relatively small scheme. Tax Revenues as Economic Benefits The Savills Assessment goes on to describe how the proposals could lead to the generation of additional public sector revenue. It is rather odd to see taxes and other transfers included as 'economic benefits'. Council Tax revenue is not 'an economic benefit': it arises as a transfer of income from private households to the Council. The same is true of Business Rates, except that the entity paying is a business, transferring funds to (at least for the majority of them) Bristol City Council. The payment of CIL is also a transfer. The New Homes Bonus is a transfer of funds from central government to local government. Where do Savills imagine the New Homes Bonus payments come from? Does the revenue materialize from thin air? HM Treasury's Green Book notes: 6.7 Transfers of resources between people (e.g. gifts, taxes, grants, subsidies or social security payments) should be excluded from the overall estimate of Net Present Social Value (NPSV). Transfers pass purchasing power from one person to another and do not involve the consumption of resources. Transfers benefit the recipient and are a cost to the donor and therefore do not make society as a whole better or worse off. Only under quite specific circumstances should taxes be included as a benefit. The Assessment makes no such case. It presents all forms of what are, for the most part, forms of charge or tax as 'economic benefits'. Understanding the economic consequences of these transfers would require additional analysis of, for example, the deadweight loss implied by the imposition of the relevant taxes / charges. In reality, the extraordinarily marginal nature of these in the macroeconomic context is such that they would not tend to have any meaningful impact on the framework of taxation and spending that government would implement as a means to achieve its overarching fiscal objectives.</p> <p>Summary There is little in the Assessment of Economic Benefits that stands up to close scrutiny. The Assessment is lopsided in the extreme. It fails to follow Green Book principles in that none of the externalities associated with building out the proposal are considered. There may also be affects on asset values for neighbours that the assessment overlooks. These would not be public disbenefits, but private ones. Nonetheless, they are a reflection of the affect of the site on the amenity of the existing property owners. Transport First of all, it seems clear that - as per the above - the baseline for the Transport Assessment is no longer the relevant one. It is not clear what the BCWEZS would do in the absence of the application being granted consent but given that there appears to be no 'Plan B', then it would be strange to assume that the baseline for the assessment is a state of affairs which no longer prevails. The attempt, in the Addendum to the Transport Statement, to reassert that the appropriate baseline for the assessment is 'the zoo use' because this 'remains the permitted use for the site' belongs in the realms of magic realism. If BCWEZS has based its strategy on a presumption that one or other, or both, planning consents would be granted (irrespective of the nature of the application made), then to the reasons for presuming such an outcome deserve scrutiny, especially if they effectively imply a fettering of the discretion of officers and Councillors to arrive at a rational decision, achieved in a lawful manner. Nonetheless, the claims in the original assessment that, for example, the design of the scheme reflects an assessment that 'in this location it would not be necessary to own a car' and that the scheme provides 'infrastructure and promotion measures ... to encourage non private car travel' cannot be taken seriously: there are 118 car parking spaces proposed. As regards collectively owned vehicles, the Transport</p>	
--	---	--

	<p>Statement notes: 'A car club space and car is proposed as part of the scheme.' That is suggestive of a scheme that does only the bare minimum. The supposed benefits of this car club space are overblown: Whilst provision of a car club vehicle still enables car travel the availability of this vehicle would reduce the need for residents to own their own private car, which in turn is a sustainable benefit to the scheme. This is also a benefit to the wider Clifton area as would enable local residents to use the shared vehicle instead of owning their own car. The aim for this vehicle to be electric brings environmental benefits. In other words, it's not even guaranteed to have the car as electric. The Planning Statement from Savills notes: 5.75. What is abundantly clear is that, while the nature of the movements may be different as the site moves from being a tourist attraction to a residential/community use, overall there will be a significant reduction in movements associated with the proposals (DM23 states that development should not give rise to unacceptable traffic conditions). 5.76. It is also relevant to note that it is understood that in excess of 85.5% of visitors to the zoo currently travel by private motor car, while the application proposals not only seek to reduce total movements, but also to encourage alternative modes of transport. [...] 5.82. Residents will not be eligible for residents parking permits and so, in comparison with the existing tourist use where there would be significant use of the pay and display on-street parking, it is anticipated that there will be a significant reduction in parking demand on surrounding streets. One could be forgiven for thinking that the two consultants' reports are discussing a completely different scheme, other than in the respect that they both assume - erroneously - that the effect of the proposal on traffic should be considered as if the Zoo was still open. The applicants may pretend all they wish that the Zoo hasn't closed, but it already has, and that decision was of the applicant's own making. The appropriate baseline for this assessment is a non-functioning Zoo, with no visitors, and no visitor traffic, not a state of affairs that has now passed, and for which there are - apparently - no clear plans to return to. But why, if the location is so 'sustainable' (what does it even mean for 'a location' to be 'sustainable?'), were 'in excess of 85.5% of visitors' to the Zoo, when it was still open, travelling by car? Why does the Transport Assessment assume that the behaviour of the would-be residents will be so different in the face of similar travel options? The reality is that the Transport Statement does not really envisage car-free travel, and is not expecting much by way of this in future. Indeed, notwithstanding the 118 car parking spaces, the Transport Assessment is happy to consider the potential for this number being exceeded. It includes a thoroughly unconvincing plan for what it appears to anticipate will be pressure for additional car parking: However BCC confirmed early in the pre-application process that residents of the BZG site would not be able to apply for on-street parking permits. This removes the potential impact of overspill parking from occurring on a daily basis, as pay and display parking locally is time limited. Therefore when residents move into the site they would be aware of whether they have space to park a vehicle or not. The level of car parking proposed is therefore designed on this basis. MFS [Manual for Streets] identifies at section 8 that lower car parking provision can be successful when adequate on-street parking controls are present, which is the case at the BZG site. Ineligibility for on-street parking permits would be made clear though any sales and marketing agent. With allocated car parking proposed this provides residents with a clear understanding as to whether their property is car free or not. The internal streets around the site would be managed by a management company to make</p>	
--	---	--

	<p>sure that no parking takes place outside of the marked parking bays. The presumption is that there would be controls feeding into habits, but as the above extracts indicate, parking restrictions locally are time-limited. Those using cars for travel into work would, therefore, compete for spaces outside the hours of time-restricted parking. Since the Statement mainly considers impacts relative to 'peak time' traffic, it is unclear whether the Statement has properly considered the possibility that would-be residents may simply take a chance on out-of-restricted hours spaces being available. Contrary to what is stated, therefore, it seems likely that there could be intense competition for local parking spaces in the hours outside the restrictions - the exact same hours when visitors to the Zoo would not have been seeking to park their vehicles. All o</p>	
470. O		09-Jan-23

471. O	<p>I find it difficult to believe that this application is considered to be complete given the lack of evidence on, notably, the environment / energy side. I have made these views known to relevant officers, but in the absence of a response to most recent questions, I note the following: The absence of an integration of a commitment to reduce embodied carbon in the design (both in terms of materials and the completely inappropriate scale) is not aligned with National planning Policy Framework, notably para 134 and the associated Guidelines. It is inconsistent with even the existing Net Zero Strategy, and not in line with stated policy in this respect. The Council has the ability through existing policies, notably BCS13, BCS14 and BCS15, to reflect the requirements of the NPPF in respect of design quality in its decisions. Given that the design fails in respect of embodied carbon / energy, then it should be refused. In respect of other matters, the 'Economic Benefits' assessment is completely lopsided. It claims to follow guidance on additionality from the now abolished HCA, making highly subjective decisions regarding the magnitude of these benefits. It also claims to follow guidance on appraisal from the Treasury Green Book. If it does so at all, it does so only in the most impartial and lopsided manner. No professional economist ought to render such a document on the basis that it captures the economic benefits. It is of concern that the comment from 'economic development' simply asks for further elaboration of these benefits without highlighting any of the very obvious deficiencies and shortcomings of the presentation. Whether or not the document concerned should carry any weight at all in a development control decision is moot, in any case, yet since the Committee and officers have tended to reference these in decision making, possibly considering this (rightly or wrongly) as part of the balance they must weigh up, then it seems entirely appropriate to indicate that the benefits assessment is, literally, Cyclopic in its outlook, focusing only on 'positive' benefits without weighing up - as per Treasury Green Book - the wider impacts of the development. These include, but are not limited to, environmental impacts, none of which have been considered in the assessment of benefits. In the expectation of further information and revision, these comments are not as detailed as they will be on receipt of a revised proposal.</p>	09-Jan-23
472. O	<p>It would be difficult to propose a less suitable development for this site for the following reasons: - The massing of the site is extremely poor, high density medium rise buildings are completely unsympathetic to surrounding listed buildings and green space. The gardens will be decimated along with the removal of 162 trees. - Six storeys is far higher than surrounding buildings and will be completely out of place. - The loss of the Zoo which has been a major public amenity for Bristolians for over 150 years. - Bristol needs affordable housing not luxury apartments. There are many brownfield sites strewn across Bristol which are craving redevelopment and which currently lie stagnant. These brownfield sites should use the massing and density that has been proposed for the Zoo site, not the Zoo. - The Zoo was thriving until the pandemic which brought financial havoc across the country. The owners seem to have jumped on this as an opportunity to wind the zoo up despite visitor numbers being higher than ever preceding the pandemic. This development is not what Bristol needs and so it should not be allowed to proceed.</p>	09-Jan-23

473.	O	The Zoo Gardens are an essential part of the city's heritage. It's shocking to see a unique resource such as this being discarded so casually. There will be a massive loss of mature trees. It seems that the financial justifications put forward don't stand up to scrutiny. The promise of permanent public access to part of the site cannot, it appears, be guaranteed. The Council should be intervening to protect this element of Bristol's history.	09-Jan-23
474.	O	I wish to register my objection to the planning application with reference 22/02737/F. The scale of the proposed development is disproportionate to the surroundings and its design is inappropriate to the neighbourhood. They do not enhance or preserve the character of the area.	09-Jan-23
475.	O	This planning application is very unsightly in an area of historical buildings. Furthermore, it will overlook school buildings, including boarding houses and bedrooms which is very inappropriate and unfair on the staff and pupils of the neighbouring school. It is an eyesore of towering flats in a nice, affluent area of Bristol. It will significantly affect the privacy of the school and overlook playgrounds too. Very against it as a resident in Clifton.	09-Jan-23
476.	O	I strongly object to this building planning. It's an historical area and to put new flat is going to look awful and make people not want to live here. The flats will tower over existing houses and a school. Privacy will be gone in both school and houses and the construction alone will be extremely disruptive to the nearby school.	09-Jan-23
477.	O	I have lived in Clifton for years and it is a lovely, private, safe and affluent area of Bristol. To accept and proceed with these plans would significantly damage this area. It would look awful and create all sorts of issues for privacy and driving and parking around the area with all those new flats/people, not to mention the risk to school children crossing the roads around there and the school buildings which would be overlooked by people in flats.	09-Jan-23
478.	O	I object to this development due to its proximity to Clifton College Preparatory School and its boarding house. Parking is already limited and traffic is already a potential hazard for pupils. It is also not in keeping with the aesthetic of the area.	09-Jan-23
479.	O	I appreciate that the area needs to be developed but the plans submitted are oppressive, not in keeping with the area and look like a old 1960s block. Terrible decision !	09-Jan-23
480.	O	Oppressive, out of keeping and generally awful !	09-Jan-23

481. O	<p>We strongly object to the proposed development on the former zoo site. The proposed development does not conform with Planning policy DM26: Local Character and Distinctiveness, of the adopted Site Allocations and Development Policies Local Plan (2014). The local area and in particular the surrounding school and residential buildings are period buildings and serve to enhance the unique character of this part of Clifton. The proposed new buildings are wholly inappropriate in size and character. They have complete disregard for the character of the surrounding Conservation Area, being of high density and modern design. The development also does not conform with the Council's adopted Urban Living SPD (November 2018). The spirit of this document is cited as being summed up by the following quotation: 'We shall be judged for a year or two by the number of houses we build. We shall be judged in ten years' time by the type of houses we build.' The proposed development achieves a large number of houses without due consideration to the type of houses being provided. The proposed development does not meet the stated aim: "New development should contribute positively to an area's character and identity, creating or reinforcing local distinctiveness". There is no positive contribution to the area's unique character and identity.</p>	10-Jan-23
482. O	<p>Having seen the plans for the Clifton development I am very disappointed. This development seems to have been planned to maximize as much profit as possible without taking into consideration designing something which matches the beauty of the area. Clifton is an area that should be treasured and protected. I am also very concerned over the reported loss of 150 mature trees which should be preserved and protected in line with the character of the area and the loss of the historic gardens which seem to be being cut considerably. From the plans, this looks like it would be an eyesore and would reduce the loveliness of the area and damage the unique character.</p>	10-Jan-23
483. O	<p>I lived next to the Zoo for ten years and am disgusted with the proposals. Any Architect who can design such brutalist and ugly buildings should be banned from his profession. The Zoo area is full of elegant Victorian buildings: these proposals are too tall, lack any charm, merely aim at packing in as many people as possible on economic grounds and take no account of people already living there. Remarkably - and stupidly - they are white! This is a rare and unusual chance to show some imagination and talent: these architects and developers clearly lack both. The plan must be rejected.</p>	10-Jan-23



484. O	Bristol Zoological Gardens are LISTED as a local historic park and garden and are an important open space. There are national collections of some plants on the site as well as wildlife whose existence on this planet is threatened. The proposed building plans would result in the loss of a major and quite unique public amenity for Bristolians and for visitors to the city. The zoo has enhanced the lives of generations for over 150 years. During the last ten years alone it has been open to not less than half a million visitors a year. In these days when we are being encouraged to plant trees and to conserve our gardens and open spaces no fewer than 162 trees will be uprooted from this site to make room for high density, luxury accommodation in blocks which are unsympathetic to the remaining buildings on the site and to what will remain of the glorious gardens which have been appreciated by millions of people over the years. They have brought peace of mind and rest to many. It has been a site where people have asked to have their remains scattered, where weddings have been celebrated and where people have been able to sit and contemplate or wander with pleasure amongst the beauties of nature. The resulting harm of these plans to the public in terms of social and material harm cannot be justified on any basis. Many of the listed buildings will be turned into apartments, their very nature changed and the site will no longer be accessible to the public. The scale of the proposed development which includes six storey flats is totally out of keeping with the surrounding area not merely in terms of scale but also in terms of building materials. The need for change of use has not been proven certainly in financial terms and the trustees of the zoo have misled the public in asserting up to the last minute that the animals would be moved to the Wild Place. It has become apparent that this is not going to be the case. Only the gorillas and the lemurs will go there. I object to this planning application in the strongest possible terms.	10-Jan-23
485. O	I object to this application because it is so obviously out of keeping with the character of the rest of the neighbourhood. There will be a loss of greenery and an increase in built up areas. The building work will be very disruptive to the whole area. I also doubt that the infrastructure is there to support all the extra residents - roads are already busy in that area.	11-Jan-23
486. O	The proposed buildings on the periphery of the site are not respectful of the precious site within Clifton. The blocks of flats are bleak and too high. Clearly the developers are, as usual, hell bent on making maximum return without designing imaginative buildings suitable for the site.	12-Jan-23
487. O	Having had a brief look at these proposals, I feel that the Zoo's development plans go against all the benefits that the area has derived from the Zoo Gardens in the past. The proposals seem ugly and inappropriate.	12-Jan-23

488. O	<p>The Bristol Zoo has such a legacy within the community and the broader city - it is such a shame to see the conservation area being turned over for commercial use in the form of large apartment complexes that don't fit with the area. The community gardens, being surrounded by apartments, are not a good enough use of that space and will decrease community engagement in the area. I'm concerned by the increase in traffic, noise, and pollution that increasing the population in the area so drastically will bring. The plans for the project go against the feel of the neighborhood and are a drastic change.</p>	12-Jan-23
489. O	<p>These proposals (a) are wholly unsympathetic, unsuitable and incongruent in scale, mass, form and design for a unique Conservation Area; (b) would overwhelm the proposed community garden and all the surrounding buildings. Note the professionally produced visualisations which have been commissioned by local residents. (c) are contrary to the National Planning Policy Framework and the statutory obligation to ensure that proposed development preserves or enhances the character of the Conservation Area; (d) will never attract people from across Bristol. (Who would want to come and see gardens in the middle of an upmarket housing estate?); (e) come nowhere near satisfying the requirements of sustainable design; and (f) present insuperable safeguarding and, because of the traffic they will generate, serious Health and Safety problems for the children of the adjoining school; They would do enormous damage done to the Conservation Area. They represent a thoroughly inappropriate legacy for the Zoo to leave after 186 years, particularly bearing in mind alternative options for the use of the site. A luxury housing estate some six stories high may, financially, be the best option for the Zoo but it would represent a disaster for the City of Bristol. It would allow the Zoo to sell the Gardens to a property developer for an estimated £40 million when it could easily adopt one of the alternative options that are available and which would enable the site to be developed in a sustainable manner and one which respects the integrity of the Conservation Area. The Committee is under no obligation to support an organisation which is in any event abandoning the City and has transformed itself from a conservation charity into, frankly, a greedy developer. The Zoo routinely claims made that the site will provide 'desperately needed housing' but this idea is risible. It is housing at the lower end of the scale that is needed in Bristol while the apartments proposed at the Zoo will be sold as luxury flats. The current design includes '20% affordable housing.' This is, most definitely, not social housing - but 80% of market rent and well out of range for key workers. If this scheme is approved there will be substituted for the iconic gardens of which the people of Bristol are rightly proud a series of ghastly, unimaginative tower blocks which will forever represent an ugly blot on the landscape. Future generations will wonder how this can possibly have been allowed. ;</p>	13-Jan-23

490. O	<p>I object most strongly to this application. I do so for the following reasons: 1. Design. The Heritage Statement submitted in support of the application makes the following claim: 'the introduction of bespoke, bold architecture into this historically separate and different site will have negligible impact to [sic] the setting of the listed buildings of Clifton College, nor to its locally-listed buildings along Guthrie, College and Northcote Roads.' Nothing could be further from the truth. The shoe-horning of 5 and 6 storey perimeter blocks of flats of monolithic design lacking in any finesse is wholly out of keeping with the robust rhythm of weighty Victorian villas, constructed predominantly from dressed rubble and Bath stone detailing, that are the feature of the surrounding buildings. The proposals fail to take any account of the height, scale, massing, shape, form or proportion of the existing buildings, skylines and roofscapes. They cannot conceivably be said to satisfy the test of preserving or enhancing the character of the Conservation Area. 2. Daylight and sunlight. The overwhelming design of the tower blocks will impact significantly on the daylight and sunlight of the surrounding buildings. I support the objections of the residents of Northcote Road and Clifton College. 3. Traffic. The scheme involves the creation of 201 residential units. This will result in a significant increase in traffic with consequential effects on pedestrian safety and substantial pressure on on-street parking. The concerns of Clifton College and of the residents in Northcote Road are entirely justified. 4. Embodied carbon. The design means that the embodied carbon and greenhouse gas emissions (that is the energy generated and greenhouse gas emitted, associated with the materials and construction process) will be far above what is recommended. Giving consent to this proposal would be wholly inconsistent with the Council's declaration of a climate emergency. 5. Charitable status. The Zoo trustees are on record as saying that they have a responsibility to achieve maximum PRICE for the land. That is wholly wrong. Their responsibility is to achieve best VALUE in accordance with their charitable purposes which include a responsibility for environmental concerns - a matter which has been pointed out to them on numerous occasions and consistently ignored.</p>	13-Jan-23
491. O	<p>Objection - full Reasons for objection: 1. Harm to the overall historic interest and significance of the site 2. Loss of the Communal Value The plans do not address the need for more local and accessible green spaces (to address the increasing mental and physical health issues). The plans do not preserve all the mature trees and shrubs (valuable assets to address climate change issues). 3. Does not reflect the dilution of UK Government's housing targets. The proposal (for a housing development) does not reflect the relaxation in the UK Government's housing plan - aka 'dilution of the housing targets' (6/12/2022). This UK government decision to be more flexible / realistic with housing targets has been made specifically to protect key sites in areas of historic interest (e.g. Clifton), which the Government has now realised are at risk of inappropriate housing developments. 4. Squandering of a public space The proposal (for a housing development) does not reflect the concerns that 'some public spaces are being squandered' (Michael Gove, MP, (27/12/2022)</p>	13-Jan-23

492. O	<p>Objection - full Any potential housing development on the former Bristol Zoo Gardens and West Car park site is totally inappropriate usage of this unique green site with it's cultural and historical significance, in a conservation area. In the 1960's Bristol Zoo was apparently very fortunate to be gifted a very large part of the former Hollywood Estate (164 acres), (now developed as Bristol Zoo's 'Wild Place'). Generosity of this kind is highly commendable. The Zoo Trustees should consider echoing this historic generosity, together with the support given to the Zoo by Bristol's citizens over the last 186 years, by gifting the whole site (Zoo Gardens and Zoo West Car Park) to the 'Citizens of Bristol for ever in perpetuity', - effectively as an extension to the Clifton and Durham Downs. Gifting the whole site to the Citizens of Bristol is something that the former Zoo and all Bristol citizens would be proud of for centuries. (The Zoo Trustees would make a significant 'profit' as a result of such a generous gift, as the on-going maintenance of the grounds and existing structures, would immediately cease. )</p>	13-Jan-23
493. O	<p>Objection A) The Bristol Zoo Gardens and the adjacent (Bristol Zoo) West Car Park individual planning applications (22/02737/F and 21/01999/F) should be withdrawn and only reconsidered as a single site. The combined site has significant historic interest, a large number of mature trees, superb gardens, a large percentage of green space and historic walls. B) Treating the Bristol Zoo Gardens and Bristol Zoo West Car Park as potential housing development site(s) is totally inappropriate use of the historic site(s). This is a once-in-a-lifetime opportunity for Bristol City to actively demonstrate a commitment to the ever increasing need for more green spaces for the mental health, physical health and well-being of citizens. The Downs (the green space, adjacent to the Zoo) has seen an unprecedented increase in usage in recent years. This is an opportunity for the City of Bristol (together with the Downs Committee, Merchant Venturers, Bristol University, etc.) to invest in the long-term future of Bristol citizens, by expanding the Downs green space, thereby making the ex-Zoo sites accessible to all citizens 'for ever hereafter' (i.e. consider protecting the Zoo site along the same basis as the Downs is protected). A precedent has already been set, as the Zoo's North Car Park site, has apparently already been reclaimed by the Downs.</p>	13-Jan-23

494. O	<p>Objection - full Reasons for objection: 1. Harm to the overall historic interest and significance of the site 2. Loss of the Communal Value The plans do not address the need for more local and accessible green spaces (to address the increasing mental and physical health issues). The plans do not preserve all the mature trees and shrubs (valuable assets to address climate change issues). 3. Does not reflect the dilution of UK Government's housing targets. The proposal (for a housing development) does not reflect the relaxation in the UK Government's housing plan - aka 'dilution of the housing targets' (6/12/2022). This UK government decision to be more flexible / realistic with housing targets has been made specifically to protect key sites in areas of historic interest (e.g. Clifton), which the Government has now realised are at risk of inappropriate housing developments. 4. Squandering of a public space The proposal (for a housing development) does not reflect the concerns that 'some public spaces are being squandered' (Michael Gove, MP, (27/12/2022)</p>	13-Jan-23
495. O	<p>Objection - full Any potential housing development on the former Bristol Zoo Gardens and West Car park site is totally inappropriate usage of this unique green site with it's cultural and historical significance, in a conservation area. In the 1960's Bristol Zoo was apparently very fortunate to be gifted a very large part of the former Hollywood Estate (164 acres), (now developed as Bristol Zoo's 'Wild Place'). Generosity of this kind is highly commendable. The Zoo Trustees should consider echoing this historic generosity, together with the support given to the Zoo by Bristol's citizens over the last 186 years, by gifting the whole site (Zoo Gardens and Zoo West Car Park) to the 'Citizens of Bristol for ever in perpetuity', - effectively as an extension to the Clifton and Durham Downs. Gifting the whole site to the Citizens of Bristol is something that the former Zoo and all Bristol citizens would be proud of for centuries. (The Zoo Trustees would make a significant 'profit' as a result of such a generous gift, as the on-going maintenance of the grounds and existing structures, would immediately cease. )</p>	13-Jan-23

496. O	<p>Objection A) The Bristol Zoo Gardens and the adjacent (Bristol Zoo) West Car Park individual planning applications (22/02737/F and 21/01999/F) should be withdrawn and only reconsidered as a single site. The combined site has significant historic interest, a large number of mature trees, superb gardens, a large percentage of green space and historic walls. B) Treating the Bristol Zoo Gardens and Bristol Zoo West Car Park as potential housing development site(s) is totally inappropriate use of the historic site(s). This is a once-in-a-lifetime opportunity for Bristol City to actively demonstrate a commitment to the ever increasing need for more green spaces for the mental health, physical health and well-being of citizens. The Downs (the green space, adjacent to the Zoo) has seen an unprecedented increase in usage in recent years. This is an opportunity for the City of Bristol (together with the Downs Committee, Merchant Venturers, Bristol University, etc.) to invest in the long-term future of Bristol citizens, by expanding the Downs green space, thereby making the ex-Zoo sites accessible to all citizens 'for ever hereafter' (i.e. consider protecting the Zoo site along the same basis as the Downs is protected). A precedent has already been set, as the Zoo's North Car Park site, has apparently already been reclaimed by the Downs.</p>	13-Jan-23
497. O	<p>To install the proposed buildings in a Conservation Area that includes residential homes and school buildings seems problematic. Not only are the proposed buildings too tall to be in keeping with their surroundings or protect the privacy of the present residents, but the additional traffic created on what is a small road would also create traffic congestion and danger for the hundreds of pedestrians, including school children, who use the area each day.</p>	13-Jan-23
498. O	<p>It's hard to know where to start. My principal objections concern loss of amenity to the City community and the inappropriate replacement of a heritage site with mundane and over-tall flats. I am especially concerned about the loss of the wonderful gardens and about likely damage to the trees. The contemporary view about the urban environment is to make lives and local amenities just that: local, hence as an example the council's closure of Princess Victoria Street to motor vehicles. This proposal will force Wild Place visitors into their cars thus contributing to environmental degradation.</p>	13-Jan-23
499. O	<p>I object to the closure of Bristol and it's conversion to housing on a number of grounds: 1) The records of the Zoo show it was profitable for most of the preceding decade, and could well be again post-COVID, many animals are not being relocated way (e.g. seals, lions) 2) The proposed buildings will not be harmonious with the surrounding houses or college buildings, and will make a very over-bearing block along the lengths of the surrounding roads. 3) The loss of public amenity is not tolerable - it would be much better, if the Zoo has to lose, to have the site developed with continued access to gardens, lake, and public facilities (e.g. a performance venue) - such as the proposals made by Clifton College Education Group</p>	13-Jan-23

500. O	Zoo and Housing Developer (Savills) making extraordinary financial gain - Zoo's closure reasoning does NOT support evidence of recent trends (pre covid) and profit. - Zoo's closure reasoning also CONTRADICTS the value of the site (plants, heritage) - Zoo's LACK of clear and transparent voting procedure - MINIMAL impact on social housing due to area - Modern housing architecture does NOT fit the local area (height, material, colour) - Well being of 2000+ students at Clifton College (plus other surrounding schools) NOT considered. The risk, and pollution, of traffic on pupils is NOT considered. - Roads NOT fit for increased traffic during peak times	15-Jan-23
--------	---	-----------

## Third consultation phase

16<sup>th</sup> January 2023 – 17<sup>th</sup> April 2023

STANCE	COMMENTS	DATE RECEIVED
501. O	I fully object to the proposed plans as they stand for the following reasons: Major concern over the height of the new buildings. They will limit light to the surrounding homes, school and frankly make no sense in a conservation area. Furthermore, the school grounds and buildings will be overlooked. Whilst I appreciate the need for homes - this is a completely inappropriate site. Due to size of the plot 200 homes requires a 'high rise' modern type build, will increase traffic (in an already busy area), reduce air quality, create major safety issues for the neighbourhood and 2 large schools and destroy the feel of the conservation area. Why does it have to be 200 homes - I fail to see the rationale for this number in this particular area. The overall management of the build in an area with constant flow of school traffic and children is a major concern. The area already suffers from unsafe drivers. I can't see a construction management plan. Whilst it would be wonderful to see this historic site continue to benefit Bristol - this current plan appears to benefit the pockets of the developers at the detriment of those who actually reside in Bristol.	16-Jan-23
502. O	I have not seen any part of the revised plan which considers the impact on the neighbourhood, surrounding schools, traffic and conservation area.	16-Jan-23
503. O	So many new documents added but I would suggest deliberately uploaded separately so that people don't have the time to go through each in detail. What is obvious though is that the plan is still to build 4/5 stories overlooking the Pre Prep and Prep schools and that residents of this new development would be able to spend all day looking at children should they wish which is very concerning. There is no comment in the plans and multiple other docs to address the safeguarding concerns of parents of Clifton College Pupils and the Developments proposed height will be an eyesore in amongst the Older period buildings. This looks like a plan out of the 70's where anything goes and are we so desperate for housing that all rules go out the window. To summarise: 1. Why shouldn't children attending Clifton College have the right to feel safe? 2. Why is it ok to build something so out of place with the area? Cannot believe this has even reached this stage but then we are talking about a Labour run Council!	16-Jan-23
504. O	My Son goes to school at Clifton College and I have a interest in the area as my family live in Stoke Bishop and lots of our friends live very close to this proposed development. These plans are terrible and very short sighted and greedy. The dwellings planned will make the local area look hideous and the security and privacy of pupils of Clifton College have been completely overlooked in the pursuit of money.	16-Jan-23



505. O	<p>I have placed several objections to these plans over the previous months. To my mind mismanagement of the Zoo's aims top my list, followed by inappropriate financial greed, inappropriate architectural dreams, and inappropriate hectoring of those involved with the outcome of traffic planning, amongst others. To those who have taken issue with Clifton College for fighting the planning application I ask; isn't taking care of No. 1 exactly what the Zoo are doing? Bristol Zoo Gardens are approximately 30 years older than the original Clifton College buildings. If Clifton College Chapel, and perhaps other buildings on the campus, is designated as a Grade 2 building by English Heritage could it not be feasible for Bristol Zoo Gardens to become part of English Heritage, Landmark Trust or National Trust to preserve what has been known for generations?</p>	16-Jan-23
506. O	<p>I object most strongly to these proposals. Could I be thinking, possibly, that greed, misappropriation, misjudgement are involved? The artists' impressions of how the Bristol Zoo Gardens will look when completed are just an idealised utopia. Don't be seduced- in practice, the realities will be very different. Will the Conservation Hub actually include details of the surrounding conservation area outside the Zoo gardens? I think not. In theory there will be two kinds of people who will live in what is proposed- this who are able to afford what is on offer, and those who are unable to do so. There will be resentment between those who can and those who cannot. I have been unable to come to terms with the 40% of 'Affordable Housing' in this setting, therefore, for those who, like me, are not sure what this means, I recommend two pieces of reading. One is the entry posted on the 15th. July named 'Housing Enabling' and the other on the internet by The Bureau of Investigative Journalism on 'Affordable Housing'. There are approximately 20,000 names on the Bristol City Council's and surrounding areas waiting for 'Social Housing'. In the 1980s Margaret Thatcher's Government introduced the 'Right to Buy' for those in long term tenancy agreements, and some 2,000,000 Council owned properties became privately owned at a heavily subsidised Government rate. Less than 5% have been replaced by new builds. So why has Boris Johnson stated publicly that he intends to extend the scheme? Council/Social housing has always been, and will continue to be, a badly needed source of housing, especially as the population increases at an exponential rate. But, please, not in the Zoo's new build, even though inclusion of 'Affordable Housing' is compulsory. Therefore the whole scheme should be stopped in its tracks with immediate effect. No trees should be felled or damaged in whatever happens in the Zoo Gardens. The gardens themselves that will be open to the public will be a magnet for those aimless individuals who sit around drinking alcohol and leave their discarded containers for others to dispose of. The plans include a grand plan to save the Bear Pit and the Raptor Aviary. These are wild creatures that need to roam. I do hope that the Polar Bear Corner will not be saved. To see the Polar Bears in their confined quarters rocking their heads from side to side as a result of their madness was pitiful. They were shot, as I recall. I would like to see local billionaires offering a substantial collective amount to the present Zoological Society so that The Wild Place Project can go ahead but to leave the present Zoo Gardens and Car park without the shameful blocks of flats and new builds. Surely, in this day and age, an agreement along these lines could be mobilised? The present planning application is a disgrace and needs a radical rethink. It is not fit for purpose.</p>	16-Jan-23

507. O	<p>Should one drive from Cribbs Causeway, past Westbury on Trym and up Falcondale Road onto Westbury Road, there appears before one's eyes beautifully constructed buildings in what is a familiar red stone. At White Tree roundabout the Downs open up to the right whilst on the left are the buildings that used to be St. Christopher's School. That view continues until Spire Hospital at the top of Blackboy Hill. The houses there are just the frontispiece for Henleaze, Redland and Cotham, mostly in the locally quarried red stone. Turning right at the top of Blackboy Hill takes one onto Downs Road, and the commencement of more beautiful red stoned houses down Pembroke Road, (the only exception being called euphemistically 'Paddy's Wigwam'), and then The Avenue with Clifton College Prep School in red stone. And the The Zoo. Approaching Bristol from the Long Ashton Bypass one has the splendid view of the Crescents overlooking the river and harbour. Along the Portway there are no houses as such until one turns right up Bridge Valley road. At the top, on the right, is Canynge Road which leads into Clifton, but on the right there is a building called The Mansion House, and a substantial row of houses that, again leads to Clifton. What a splendid sight those red houses are. And then the Zoo. I have been familiar with what I have described for seventy odd years. I am dismayed to find the plans for the 'refurbishment' of Bristol Zoo gardens are not in keeping with what I have described, but more of mass habitation out of kilter with the conservation area surrounding it. The tall blocks on the perimeter of the zoo, with animals depicted, will be an eyesore, and once winter arrives with lights on in the windows and the heat pumps operating, they will appear more like a cruise ship at sea. So, with that in mind, I suggest that the planners insist on funnels being included in the plans and the whole being called, 'SS Clifton Encore'.</p>	16-Jan-23
508. O	<p>The updated plans remain wholly inappropriate in an area of conservation. The proximity to the school, the Downs and a Resedential neighbourhood has not been considered in proposing a huge block of flats that are an eyesore. I'm not opposed to development but I can see no sensitivity demonstrated here. Strongly oppose</p>	16-Jan-23

509. S	<p>It is not surprising a new housing development on a much loved zoo site attracts strong feelings. Notably when it came to finding means to support the zoo to stay open at this site with funding from this same public, that did not materialise. Bristol needs new housing. This is a large area of land being redeveloped with careful consideration to provide this very much unmet need. It is heartening to see a mixture of new housing including the provision of some affordable housing as well. The objections from the nearby private school and parents of pupils from this school strike me as incredibly unjustified and unfair. We should not be giving undue weight to the already very privileged to pull the ladder up from others in society (in this cases through maintaining the status quo of insufficient housing stock in Bristol). Finally, the following is not likely to be a popular opinion, and overall I remain supportive of this application, however I think more rather than less housing should be planned and provided. I do not think it is particularly good land use or equitable for the wider community that large tracts of this development are dedicated to public space. It would be better for this to be used instead to site more housing but I also understand that often people like having areas of green space next to them. It is worth considering that the zoo site is right next to the very large green space of the downs however.</p>	16-Jan-23
510. S	<p>I remain supportive of this development. The housing proposals are simply beautiful and give the public access to a lovely garden for free. I do not sympathise or empathise with the reflexively negative commenters objecting to this proposal. As far as I can tell these people would only be happy if nothing ever changed, if no new people ever moved into Bristol, and they could maintain a static city. I implore the council to ignore the objections from people who are simply resistant to any change - they will never be pleased by any proposal. If it were up to them their own houses would never have been built in the first place as they would have objected to any building without a thatched roof. Modern buildings with timber frame construction are brilliant, long lived, and have a much lower environmental footprint. They allow for modern energy efficiency standards to be met and they can be built quickly. Bristol is a growing and vibrant city. Trying to block people being able to get new homes here is simply an injustice and is leading to increasing problems of housing insecurity in the aggregate. Consigning people who want new homes to only buying in the suburbs on brownfield sites is not fair and also not going to allow the city to meet climate targets. We need more density to promote alternative transport modes such as cycling, walking (not to mention fee paying customers to support more bus routes) which lessens the climate impact of people who would otherwise be spread further and more inclined to drive. Bristol Council should be embracing this fortunate position it finds itself in as a popular city for people to move by enabling more housing development at density. In time this will significantly support plans for e.g. a Bristol metro by providing the customers that will use it. I also think the arguments re "not enough affordable housing" should be ignored - the site needs to be commercially viable to support the new Zoo site, and also 20% of ~150 homes is a lot of new affordable housing that would not be available if this site is not built. International data from cities in New Zealand and Canada has demonstrated the clear correlation of easing housing development through e.g. permitting reform/planning rules promoting density, and reducing the rate of house price growth. This should not have to be explained but if you increase supply to meet demand, price falls. People understand this with daily</p>	16-Jan-23

	<p>purchases but seem to think housing is a special case. Notably in Harlem, New York City, USA recently a housing development of a large apartment block was opposed through similar arguments of "insufficient affordable housing" - the site is now being continued to use for its current purpose, a truck (lorry) stop. These objections are what I class as bad faith objections. Often such objections are made simply to prevent any new building and are not truly concerned with provision of affordable housing. Finally, I feel this site should not have any barriers to increasing density or implementing the full vision of its design. The architect has designed a truly beautiful site and it would be a shame to allow these NIMBYs who seem to be organising an undemocratic astroturf campaign against the development to win with their regressive arguments. These objectors just want to maintain their property values at the expense of the rest. The losers of such an outcome are the people of Bristol.</p>	
--	---	--

511. S	<p>The BZG planning committee have made very detailed and considered changes to the original development proposal. It remains a much needed source of new housing in Bristol whilst preserving the heritage of the zoo site. It will add very well designed new housing to a very constrained housing stock in Bristol. I remain shocked at how selfish very affluent local residents and parents/members of an elite private school can be in carpet bagging this planning portal with objections to this extremely reasonable proposal. If this was so important to keep things as is these same people should have actually found a way to financially support the zoo to keep the site. Appeals were made and met with deaf ears at that time hence the BZG site being proposed. As it is, the BZG team are taking a very considered approach to the design which is above and beyond what a standard private developer should do: the site is being made accessible to the public and for free (this was not the case before when the zoo was open); they are providing a mix of housing for more affluent residents whilst also providing a significant percentage of affordable homes; there is real preservation of garden and iconic parts of zoo architecture. With the amended application the BZG has made amendments to reduce some multi-family housing due to the aforementioned objections. I personally do not think these changes were needed, but they did make them thus demonstrating the BZGs real commitment to acknowledging and responding to criticism as reasonably possible. In terms of the overall site, I remain fully supportive - we desperately need more homes in Bristol, and especially need more homes in central areas of Bristol. To really fight climate change at a council level we should be improving density so people can walk/cycle instead of commute to workplaces. Building densely supports business by increasing their market too. Building more homes helps increase the supply of housing and helps gradually deal with the homeless situation. These are not disputed facts. I hope the bad faith objections of NIMBYs in Clifton do not overwhelm reason when it comes to this application. Also it is worth emphasising, people in Bristol who own very expensive homes have a personal financial interest in keeping the housing stock limited at this end of the market - it inflates the value of their homes accordingly. Many of the objections appear to be obfuscating their true intent. Frankly if a detailed, well considered application like this does not meet an acceptable standard, what would? Inaction will lead to an empty undeveloped site, or some parking - that is not a good use of space. (I am not even acknowledging the what can only politely described as 'eccentric' proposal to build a VR zoo in a massive hangar building that has been astrourfed as a supposedly reasonable alternative). Finally, this whole process highlights the unfair nature of the state of planning permission in the UK. Who comments on these applications, and whose voices are unheard? Do comments on this application reflect the sentiment for the wider community? Do random comments from pressure groups reflect democracy or justice? I hope when the council considers these objections or comments in support of the application these questions are also considered carefully. I hope my comment does not appear intemperate but as a millennial medical doctor in the NHS and also researcher at the University I have struggled with the housing market in Bristol, and despite my profession being relatively well paid. I think the council should work for everyone rather than those sections of society who happened to buy housing 20-30 years ago when the average mortgage was 3-5 times an average yearly salary as opposed to the 10-20x it stands now.</p>	16-Jan-23
512. O		16-Jan-23

513. O	The designs for the new buildings are such a contrast to the rest of the houses and buildings in the area. They will create a visual block of hard materials in an otherwise nature lead community. The buildings will also cause a loss of trees and public green space. It is listed as a local Historic Park & Garden and an Important Open Space.	16-Jan-23
514. O	This preposterous monolithic rectangular development is an eyesore and visually so jarring compared to the period architecture of Clifton. It does not preserve the area, and certainly doesn't enhance it, which is the requirement for building on a conservation site. It looks like the architect "copied and pasted" a Swindon office block design and tried to transplant it into a conservation area with no consideration of the surrounding neighbours and environment. Parking is insufficient for the number of flats based on average car ownership, which will strain existing resources. The architect seems to have worked hard to develop a design that will decimate as many of the mature trees as possible - over 46% of those on the site - which is not in keeping with the zoo's legacy nor compatible with the conservation area. After living in Clifton for many years and spending periods serving as a parish councillor, I can honestly say this is the least appropriate planning application I have seen in over two decades.	16-Jan-23
515. R	This preposterous monolithic rectangular development is an eyesore and visually so jarring compared to the period architecture of Clifton. It does not preserve the area, and certainly doesn't enhance it, which is the requirement for building on a conservation site. It looks like the architect "copied and pasted" a Swindon office block design and tried to transplant it into a conservation area with no consideration of the surrounding neighbours and environment. Parking is insufficient for the number of flats based on average car ownership, which will strain existing resources. The architect seems to have worked hard to develop a design that will decimate as many of the mature trees as possible - over 46% of those on the site - which is not in keeping with the zoo's legacy nor compatible with the conservation area. After living in Clifton for many years and spending periods serving as a parish councillor, I can honestly say this is the least appropriate planning application I have seen in over two decades.	16-Jan-23

516. O	<p>The short, medium and long term impact of changing Bristol Zoo into a housing development will in total damage the importance of the history associated with Clifton, along with the damage it will do to the current wildlife associated with Bristol. Short term: The huge variety of trees and flowers currently in the zoo will be removed to create a large building site. We should be preserving and protecting the small amount of wildlife which we still have in this city. Why can the Bristol zoo been turned into a national trust site, a beautiful garden and museum for family to spend time in nature. Medium Term: The pollution (noise and chemical) pollution caused by such a significant amount of work will have an extremely negative impact on the surrounding homes, children will be breathing in pollutants caused by all the clogged traffic. This is to provide only a small amount of flats for an elite group of people (this is not the way to solve the housing crisis in Bristol), we have seen other developments like this in Bristol &amp; London which are viewed as investments and do not bring more homes but just bring profit to the businesses. Long term: We loose one of the most important and historical parts of Bristol. So many people in the UK have a memories of visiting the zoo, spending time with family. The zoo is such an important historical landmark we should we celebrating its history and turning it into somewhere future generations can enjoy.</p>	16-Jan-23
517. S	<p>My comments are the same as those supporting the original application, with the addition that the further information enhances the scheme. For the record, my original comments were: I believe this application meets all the necessary planning guidelines/policies and would deliver much needed housing into Clifton, including affordable homes. It is also a very attractive development and allows the central historic gardens to be open to the public for free. The development of the site will allow the Zoo to continue its development of a new Bristol Zoo at its Wild Place site together with its ongoing conversation and education work, which would benefit everyone living in the Bristol area and beyond.</p>	16-Jan-23
518. O	<p>I strongly object to the proposed development/planning application. The monolithic blocks are absurdly incongruent with the surrounding structures in design , scale , mass and form . They will completely overwhelm the gardens and obliterate streetviews of the sky, mature trees , and the nearby historic buildings that characterise Clifton. The entire development is entirely disproportionate and totally unsympathetic to Clifton and a violation of the neighbourhood. I deeply regret the passing of the zoo and the proposed development must be stopped.</p>	16-Jan-23

519. O	I oppose this proposal primarily on the basis of its complete failure to preserve or enhance the Clifton conservation area. - Failure of the architecture to respond properly to or integrate with the surrounding established character and context - Overbearing, over-intensive and unsympathetic scale of development - Unjustified and irreversible harm to listed buildings - Appearance of a gated community, even a prison complex behind high walls, completely the opposite of what Bristol considers as its general outlook on life - Public access not legally assured - Not allowed for in the statutory local plan - Failure to give "considerable weight" to a heritage asset - Therefore not in accordance with applicable conservation legislation - Clear danger of erosion of BCC's standards applicable to future conservation area planning proposals I support the BCC Conservation Advisory Panel's submission, and that of Historic England, who have commented that the closure of the zoo site will have a pronounced harmful impact on the significance of the site (and have not withdrawn this view while giving credit for some extremely minor revisions).	17-Jan-23
520. O	I have read the applicants' new replies to the planning officer and viewed most of the supporting documents. My chief objection remains, relating to the failure to abide by requirements of the conservation area status of the local area and resulting incongruous and overbearing design. The latest inputs on the conservation area and heritage appear to acknowledge harm and speak of "mitigation" rather than "enhancement". There are some arguments referring to "enhancement" but they are weak or even bogus, relying on the quality of the development and public access rather than the design or density of the development. The objections based on the scale and blockiness of the buildings are unmitigated by the very minor proposals to soften the outline and to limit overlooking. The proposal says there need be enough free market dwellings to contribute about £1300 each in estate service charge to fund the public realm aspects. But there could be many fewer dwellings, contributing less than this, if proper account were taken of using volunteer gardeners, surpluses from events, and voluntary public donations (compare with quantum of such funds collected by Clifton Suspension Bridge). The idea of the Clifton Conservation Hub is extremely welcome and could be very successful as well as a source of funding for the public realm. I ask the planners to take full account of the risk of blowing the whole concept of conservation area status out of the water, yielding an unmanageable precedent not only in Clifton but elsewhere. Among all the public comments I have noted only one recent one in support and as it is anonymous there must be doubt about the weight to give it.	17-Jan-23
521. O	Highly uncreative & poor use of a valuable public space. Poor architecture. Jarring to local environment.	17-Jan-23



522. O	Once again I write to object to this scheme. Tower blocks surrounding the site - totally out of keeping with the present Clifton landscape. A blight on an attractive part of Clifton. The whole project appears to be a money making exercise for the Zoo. Please take note of the myriad objections you have received over the long time this proposal has been in the pipeline. If this proposal goes ahead it will be a matter of great upset and regret to many of the citizens of Bristol. I also note that very few of the animals are being relocated to the Wild Place. Lions, penguins and meerkats, to name a few, are waiting for some other Zoo in the world to take them - they will not be at the Wild Place at all.	17-Jan-23
523. O	To whom It may concern, I wanted to raise my objection to these plans base on the historic site at Bristol Zoo. Although I am a resident of Bath, I live in Bristol for the vast majority of my life, and have visited the zoo on hundreds of occasions. My grandparents, parents and children have all visited the site with me, so it hands been an intergenerational part of my life. I do not believe these plans have taken in the full historical significance of the site, which one gone will be lost forever. A much more detailed plan and analysis must be taken of the site, which is such a huge part of Bristol's heritage. This will cause irreversible damage to a historic site, and take it from the public's reach. There are also massive concerns about the lack of green space, and also that generations of people will lose access to a site that promotes conservation and sustainability in the centre of the city. To remove this for housing is a step backwards when it comes to improving the cultural heritage and green credentials of the greatest city on Earth. Bristol Zoo is a unique place, and more care must be taken over its future. Thank you for your time, and I implore you to understand the strength of emotion these words have within them, and to reconsider this planning permission.	17-Jan-23
524. O	Again we write to object to the current proposals for these developments. Previously you have ignored all objections from residents of adjoining properties, many other local residents, interested friends and professional advisory bodies. This is to the detriment of Clifton and needs to be corrected ASAP. To date you are failing in your duty to enhance and protect the conservation district of Clifton. Some of the land was covenanted by previous residents and other benefactors to the city. This should be honoured and even celebrated for its unquestionable worth and contribution to the benefit and reputation of the city of Bristol. Various promotional misinformation has been disseminated and it appears from the current plans that only the Zoo will benefit particularly financially. Alternative proposals should be considered where the architecture and density is reconcilable with surrounding listed buildings. Yours faithfully Ruth and David Slinn	18-Jan-23

525. O	<p>The proposed plans to develop the existing Bristol Zoo site are not in keeping with the existing conservation area surrounding it. The scale of the buildings and the unimaginative design will dwarf the existing buildings that surround the zoo i.e. Clifton College, potentially blocking light along with creating an eye sore in the local area of period architecture and general street scenes of Clifton. The proposed design looks more like a housing estate than a high end development. The amount of dwellings proposed will increase traffic and stretch already over used street parking availability. A small number of townhouses would be more appropriate rather than a mass over development of this site. I live 5 minutes walk of the zoo site and to upkeep our period property we have to get planning permission from the Council to maintain the building (eg change windows) and trim the trees. I completely understand the need for these rules in order to keep the conservation area... but then to allow a development like this in the area defeats the point! From an environmental point of view the amount of mature trees the developers will have to pull down within the zoo in order to build the new development is also a big concern.</p>	18-Jan-23
526. O	<p>This development does not appear to be in keeping with the character of the Victorian area. The number of units seems excessive and will change the ambience of the locality. 196 new properties in a small area will cause congestion on the roads, additional noise and parking issues. All the local facilities such as the doctors surgery are already under pressure and this will just add to the situation.</p>	18-Jan-23
527. O	<p>I am objecting strongly and seriously against the above application. The proposed Zoo's application for the main site plan bears no relation to its unique conservation area. It would look unsuitable in any part of this great city due to its unsympathetic and massive scale, which will dwarf the proposed community garden. It is brutalistic and Putinesque in design. The application is working against respecting a conservation area and contrary to the National Planning Policy. The site faces The Downs with its natural beauty currently enhanced by neighbouring listed buildings. The plan will take the soul out of a beautiful area which has been enjoyed for centuries by the people of Bristol and even more so with the arrival of the Zoo in the mid nineteenth century. Who will benefit from this?</p>	18-Jan-23
528. O	<p>This can not be allowed to happen, with so many children attending Clifton College, what is but in place for their safty? What about boarding children? These buildings will look directly on to the school! What about all the extra traffic with all the child pedestrians? Absolutely should not be allowed to go ahead</p>	18-Jan-23

529.	O	Having recently seen some scale visualisations of the Zoo's proposed housing development for their main site, I wish to object in the strongest possible terms to the plans put forward. Bearing in mind that planning law states that for a conservation area, "special attention shall be paid to the desirability of preserving or enhancing the character of the area", it seems to me that the monolithic mass and form of this proposed development is entirely incongruent with such a historic conservation area in design, scale, mass and form and in its overall impact. These large, long, flat-roofed block housing developments are overpowering and appear totally out of keeping with the surrounding conservation area.	19-Jan-23
530.	O	I wish to object to the proposed plans for the redevelopment of the former Bristol Zoo Gardens site. The appearance of the proposed development is incongruous with the surrounding historic buildings. In addition, the scale and height of the blocks of flats will have a negative impact on the level of light and skyline views in adjacent roads and buildings. I consider the removal of a significant number of mature trees and the negative impact of this on wildlife to be a serious concern and inappropriate for a conservation area. The parking and road safety issues in the area, which will result from the additional vehicles associated with the development, is of significant concern and another reason why I object to this planning application.	19-Jan-23
531.	O	We object to the proposed development/planning application. The six storey blocks are not compatible with the Conservation area and are an abuse to the legacy of the Bristol Zoo. Public access to the gardens and magnificent trees will be lost forever, this too is unacceptable. More careful consideration must be made of a site which is such a huge part of Bristol's heritage and played such a large part in the lives of generations of its residents. The proposed development will be immensely damaging to the precious place that has promoted conservation and sustainability in the centre of the city.	19-Jan-23
532.	O	object on multiple grounds - congestion, safe guarding (Young children at school in neighbouring buildings), health and Safety. This appears to be motivated by financial return rather than enhancing the community.	20-Jan-23
533.	O	The proposal is at odds with Bristol's ambition to be be Carbon Zero city by creating an environment that will reduce green space, increase traffic and destroy what is a beautiful part of our city - it would never happen in Bath!	20-Jan-23
534.	O	Received a letter from the Zoo and the pictures on the first page showing a park area all look great. I looked at the next page and see 6 story buildings are being proposed. 6 stories is far too high and out of keeping with the general nature of Clifton. Any new build should be no higher than the typical Victorian properties in Clifton and designed in a style far closer to the other Victorian buildings in the area - not modern high rise blocks of flats. These are visually out of character with Clifton.	21-Jan-23

535.	O	Through the enormous mass of documents revising the plans, I couldn't see anything addressing the awful external nature of the proposed development. The proposals are still totally out of keeping with the visual appearance of the local area and would be a blot on the landscape. Any development must fit in with the rich architectural character of this part of Clifton - the proposals have total disregard for the fact this is a Conservation Area.	21-Jan-23
536.	S	All the new properties should have covered balconies. Surely we learnt that during the pandemic, and makes them feel so much more airy, accessible, environmental (plants), communal and practical. Could envisage buying one of the new properties, as this is potentially a lovely development, but only if with a balcony (or terrace if ground floor).	21-Jan-23
537.	S	Looks like a fabulous idea. However I would propose 2 things: Firstly that almost all the properties have a covered balcony - so much nicer to live in and environmentally sound - covered to provide an outside space even in inclement weather. Secondly - consider stone/brickwork as used in the Redland Girls School development (Bath stone?) Which looks lovely and in keeping with the area. Some indication of likely prices of resulting properties would be interesting please.	21-Jan-23
538.	S	buildings could be more attractive - more glass, more balconies	21-Jan-23
539.	S	support it if they all have covered balconies, would make it lovely.	21-Jan-23
540.	S	just make all the apartments with a covered balcony/terrace - so much better for enjoyment of the outdoors	21-Jan-23
541.	S	All the new properties should have covered balconies. Surely we learnt that during the pandemic, and makes them feel so much more airy, accessible, environmental (plants), communal and practical. Could envisage buying one of the new properties, as this is potentially a lovely development, but only if with a balcony (or terrace if ground floor).	21-Jan-23
542.	S	support it if they all have covered balconies, would make it lovely.	21-Jan-23
543.	S	buildings could be more attractive - more glass, more balconies	21-Jan-23
544.	O	My original objections are unchanged by the revised proposals. The proposed development is in a Conservation Area The design of the houses is totally out of keeping with the Victorian houses in the neighbourhood and indeed most of Clifton. What's more they are high, much higher than most of the perimeter of the existing site so will stand out very prominently. I don't object to new houses being built but it is a Conservation Area and therefore the design should be in keeping with the surroundings and the heritage of Clifton.	21-Jan-23
545.	S	Looks like a fabulous idea. However I would propose 2 things: Firstly that almost all the properties have a covered balcony - so much nicer to live in and environmentally sound - covered to provide an outside space even in inclement weather. Secondly - consider stone/brickwork as used in the Redland Girls School development (Bath stone?) Which looks lovely and in keeping with the area. Some indication of likely prices of resulting properties would be interesting please.	21-Jan-23
546.	S	buildings could be more attractive - more glass, more balconies	21-Jan-23
547.	S	support it if they all have covered balconies, would make it lovely.	21-Jan-23

548.	S	just make all the apartments with a covered balcony/terrace - so much better for enjoyment of the outdoors	21-Jan-23
549.	S	All the new properties should have covered balconies. Surely we learnt that during the pandemic, and makes them feel so much more airy, accessible, environmental (plants), communal and practical. Could envisage buying one of the new properties, as this is potentially a lovely development, but only if with a balcony (or terrace if ground floor).	21-Jan-23
550.	S	just make all the apartments with a covered balcony/terrace - so much better for enjoyment of the outdoors	21-Jan-23
551.	S	Looks like a fabulous idea. However I would propose 2 things: Firstly that almost all the properties have a covered balcony - so much nicer to live in and environmentally sound - covered to provide an outside space even in inclement weather. Secondly - consider stone/brickwork as used in the Redland Girls School development (Bath stone?) Which looks lovely and in keeping with the area. Some indication of likely prices of resulting properties would be interesting please.	21-Jan-23
552.	O	Bristol Zoo is the jewel in Clifton, Bristol's crown, world re known and it's gardens and buildings of historic interest. It is a travesty to allow it to be desecrated in favour of new expensive flats when the real need in Bristol is for homes for young people and people on low incomes. It is not clear why the Zoo cannot continue, there is no transparency on why these decisions have been made Loss of public amenity, while climate change is on everyone's minds, almost half of the trees be removed and some of the others may be damaged. The buildings proposed will completely overpower the surrounding buildings, they will completely change the character of the area Please Bristol Council be brave and be the first council in the UK to reject a commercial application, in favour of being seen to do the right thing for local people and the city of Bristol. If there is no going back for Bristol Zoo then please reject this application and insist on housing for young people and low income families who currently cannot find suitable housing.	21-Jan-23
553.	O	It's very disappointing to see such a valuable site be potentially ruined by blocks of monotone flats which don't have any character or individuality. Clifton is a beautiful, historic area of Bristol, where the buildings are unique. The proposed flats would tower over the decades-old buildings and impose on the rest of this beautiful area. Bristol zoo was a special place to so many. The council should invest in something which would do it justice, like a botanical garden or green area. There are so few areas in Bristol which aren't packed full of tower blocks and social housing. Clifton is special in this sense, which is why some many chose to live here. Bristol city council should value their residents and stop putting money before everything else.	22-Jan-23
554.	O	We would like to object again to the proposed development at Bristol Zoo which would undoubtedly make life difficult for Clifton College. The buildings overpower all those nearby and the parking provision appears totally inadequate. Moreover, the strain on local services such as doctors' surgeries would be excessive.	23-Jan-23

555. O	We would like to object to the proposed development at Bristol Zoo. The intended buildings at the edge of the site are totally out of keeping with the surrounding late nineteenth century architecture, in building materials, design and scale. This is particularly undesirable in a conservation area. Moreover, it is surely unrealistic to think that private houses within the site will mix with play areas and paths for cyclists travelling at speed. Such density of housing would set a dangerous precedent for future development in Clifton. We would also deplore the felling of any trees at the site. Jon and Pat Millington	23-Jan-23
556. O	The minor modifications recently made to this Application entirely fail to address the concerns of CHIS who consider it to be clearly contrary to BCS 22. It represents an over-intense and overbearing development which would, without reasonable justification, adversely affect the character of this part of the Clifton Conservation Area and the setting of its listed buildings. Our views are entirely in line with those of Bristol City Council's Conservation Advisory Panel of which CHIS is a member and whose letter of 20 November 2022 sets out in some detail the architectural poverty of the scheme and its detrimental impact on heritage assets.	23-Jan-23
557. O	The following represents a slightly revised version of the comments originally posted on August 7th. CHIS strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable. The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape, and skyscape of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique. Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely ignored. The following points summarise some of the most blatantly pernicious aspects of the proposals : 1. 196 dwellings represents a massively over-dense development of the site. 2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest. 3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the block on the northern boundary, 4. The proposed terracing is not appropriate in this area. 5. The loss of trees will be compounded by the inevitable damage to the roof systems of many other trees by infrastructure work. We urge rejection of this highly damaging Application.	23-Jan-23

558. O	<p>The Clifton &amp; Hotwells Improvement Society strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable in their current form. The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape and skyscape of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique. Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely ignored. The following points summarise some of the most blatantly pernicious aspects of the proposals : 1. 201 dwellings represents a massively over-dense development of the site. 2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest. 3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the six storey block on the northern boundary. 4. The proposed terracing is not appropriate in this area. 5. The loss of trees will be compounded by the inevitable damage to the root systems of many other trees by infrastructure work. We urge rejection of this highly damaging Application which, far from leaving a worthy legacy, would irrevocably damage one of the finest sites in Bristol.</p>	23-Jan-23
559. O	<p>The reasons for my objection are as follows; 1. The proposed buildings are not architecturally sympathetic to the period and style of the adjacent buildings. 2. The proposed buildings appear higher and closer together than neighbouring buildings. 3. The proposed development will create an environment which is not in keeping with the feel and ambiance of the existing area. 4. I am horrified that such a beautiful and historically important site would be given over to such vulgar and unattractive buildings. I totally agree there is a need for additional housing in Bristol but I cannot support any development which is not architecturally in keeping with the existing buildings in that particular area. 5. The number of proposed housing units will result in a site that is overpopulated for the size of actual building plots compared with adjacent and neighbouring homes.</p>	23-Jan-23

560. O	<p>There's still time to save the one and only Bristol Zoo, so much history and progress would be lost. This unique Bristol institution has huge cultural and architectural significance. It is of unrivalled importance to the identify of Bristol as well as providing irreplaceable value to the people of the wider area too, as an educational and spiritual sanctuary from the fast pace if modern life. Sell part of the Cribbs Causeway site for houses instead, it makes so much more sense, in terms of transport links, there is no history there and very little evolutionary development - Clifton holds the soul of Bristol Zoo. If the Clifton site as we know it is destroyed, we will truly loose Bristol Zoo forever. This is an ill thought plan, made in a snapshot of time by an unrepresentative management. Don't give up on Bristol Zoo Clifton, adapt where necessary to survive and save this Bristol Institution for the families and people of the past, the present and possibly most importantly our families of the future.</p>	23-Jan-23
561. O	<p>The aesthetic and scale of the buildings proposed is entirely out of keeping with the historic features and character of Clifton, the reason residents chose to live in this area. The height and stark design of the buildings proposed further emphasises this. Clifton's character has been preserved against previously sought developments, for example the destruction of the Lido. I feel that this proposed development would be looked upon as similarly short sighted in years to come. On street parking in Clifton village and towards the downs is stretched as it is. With the density of residents proposed the number of vehicles (when parked and when on the road) would be a huge problem for the narrow quiet streets of the area. I also object to the proposed removal of so many mature trees, for wildlife and conservation and with air quality improvements otherwise sought in the City. Acquiring an appointment at the local GP surgery or dentist is already a huge challenge with the number of patients, the massive density of units proposed will put all local services under further strain.</p>	24-Jan-23
562. O	<p>Whilst it seems inevitable that the Zoo site will be used for building it is still important that the area be used for the benefit of as many and diverse individuals as possible. This includes access as an open space and housing provision for people of limited means or with disability. It seems sad that the committee in charge of housing development should be willing to accept a 20% provision of such accommodation in return for a guarantee of the work being commenced quickly (short term benefit) whereas the full 40% legal requirement would be of major long term benefit. The original much vaunted open access to the site and provision for its long term maintenance now seems at risk. The suggestion that ongoing costs of this should be borne by the residents ( apart from those in social housing) and this necessitates the maximum number of residents and the minimum of those in social housing is a spurious way of reducing the % of social housing. I would suggest that there should be a sum of money put in trust by the developers for the grounds maintenance from the outset.</p>	25-Jan-23



563. O	I note that there is no guarantee of perpetual public access to the gardens. Indeed, access gates with keypads, such as are proposed for the pedestrian gate on the boundary alongside Clifton Down Road, are definitely not 'open access'. Whilst the site is currently gated, there is no reason for this to be perpetuated. To create a ghetto, albeit one with wealthy residents seems undesirable. The revised proposals do not address the concerns raised by myself among others to the original high density and physical height of the block of flats, N1 etc. . Amendments to the layout within the blocks are immaterial when the block itself is the problem.	25-Jan-23
564. O	The density of the proposed housing, in particular high rise Block N, is too great for the area. The character of Clifton Down Road is of individual buildings the majority of which were originally designed as single family dwellings although I accept that some are now subdivided into flats. A monolithic high structure would adversely impinge on the area and should be avoided. The existing boundary wall currently conceals the buildings within the zoo grounds, that should remain its purpose.	25-Jan-23
565. O	The revised proposal still consists of excessively high blocks all around the site perimeter which are far taller and denser than any surrounding buildings. The design does not compliment or reflect local building styles. The number of mature trees that will either be removed or relocated is very concerning as is the proximity of building works very close to trees being retained.	26-Jan-23

566. O	<p>I strongly object to the proposals insofar as they relate to the southern end of Northcote Road in particular. There have been only minor changes to building E2 and no changes at all to building E3. Contrary to the impression given (for instance Penoyre &amp; Prasad's answer to Q2 raised by Clifton College, as set out in Appendix 5 of the October 22 Planning Statement), building E3 has been set no further back than shown in the October 2021 consultation, nor has it been reduced in height. Building E3 itself dwarfs the other buildings in Northcote Road in scale and height, as is clearly shown in document BZG-PPA-ZZ-ZZ-DR-A-2602-PL1. What is not shown so clearly in that document is its height in relation to numbers 1 and 2 Northcote Road, both substantial Victorian houses. Based on the proposals, building E3 would be over 8 metres taller (measured to the eaves) or 6.5 metres taller (measured to the ridge) than these houses, contributing strongly to the overbearing effect. I have previously raised a concern as to the adverse impact on the front gardens of numbers 1 and 2 Northcote Road from overshadowing, particularly the loss of afternoon and evening sun. I do not believe that this has been addressed. The gap between buildings E2 and E3 is of limited benefit to those neighbours who are positioned further along Northcote Road, particularly towards the southern end, where the unrelenting mass of building E3 will dominate. The daylight and sunlight assessments show adverse impacts to several rooms in residential properties in Northcote Road, beyond BRE guidelines, with rather trite comments such as 'retained daylight levels are considered acceptable' or 'the neighbouring residential properties will generally remain with adequate levels of daylight and sunlight'. To whom they are considered acceptable is unclear, but it is certainly not the owners of the properties concerned. Nor does there appear to be any recognition that it is generally the principal reception rooms (those on the lower floors) that are worst affected, and where the loss of residential amenity will be most felt. To summarise, those residents towards the lower (southern) end of Northcote Road are particularly severely impacted by the proposals, largely because of the extreme height of building E3 and its proximity to neighbouring properties, but also because it is positioned in such a way that it will take away much of the afternoon and evening sun. Without a significant reduction in the scale of this building, I urge the planning committee to reject the proposals.</p>	26-Jan-23
--------	---	-----------

567. O	<p>I wish to reiterate my objections to the proposed development. I am extremely disappointed that, despite our having raised objections on numerous occasions throughout the consultation process, the applicants have made no changes of any significance to the proposed Building E3. This building is, quite simply, far too tall relative to existing neighbouring properties in Northcote Road. This is in a Conservation Area whose character should be preserved if the term is to mean anything at all. As it stands, building E3 would tower over neighbouring properties, dominating the outlook even from upper floors, and casting lower floors and front gardens (which currently enjoy a sunny outlook) into shadow for much of the day. The effect on those of us living in the area in terms of mental health and wellbeing would be devastating. Quite apart from the issue of height, the proposed buildings are not at all sympathetic to their surroundings: the overall design of the site, comprising high blocks placed around the perimeter, has the appearance of the worst sort of gated community, designed to keep people out rather than to contribute to the wider community. If the site is to be developed for housing, then please make it more sympathetic to its surroundings to avoid doing irreparable harm to buildings that have stood there since the Victorian era, as well as their residents. This could be done by reducing the height and massing of buildings and setting them further back from the perimeter.</p>	26-Jan-23
--------	--	-----------

568. O	<p>I strongly object to the proposals insofar as they relate to the southern end of Northcote Road in particular. Contrary to the impression given (for instance Penoyre &amp; Prasad's answer to Q2 raised by Clifton College, as set out in Appendix 5 of the October 22 Planning Statement), building E3 has been set no further back than shown in the October 2021 consultation, nor has it been reduced in height. Building E3 itself dwarfs the other buildings in Northcote Road in scale and height, as is clearly shown in document BZG-PPA-ZZ-ZZ-DR-A-2602-PL1. What is not shown so clearly in that document is its height in relation to numbers 1 and 2 Northcote Road, both substantial Victorian houses. Based on the proposals, building E3 would be over 8 metres taller (measured to the eaves) or 6.5 metres taller (measured to the ridge) than these houses, contributing strongly to the overbearing effect. I have previously raised a concern as to the adverse impact on the front gardens of numbers 1 and 2 Northcote Road from overshadowing, particularly the loss of afternoon and evening sun. I do not believe that this has been adequately addressed. The gap between buildings E2 and E3 is of limited benefit to those neighbours who are positioned further along Northcote Road, particularly towards the southern end, where the unrelenting mass of building E3 will dominate. The daylight and sunlight assessments show adverse impacts to several rooms, beyond BRE guidelines, with the rather trite comments that the 'retained daylight levels are considered acceptable' or 'the neighbouring residential properties will generally remain with adequate levels of daylight and sunlight'. To whom they are considered acceptable is unclear, but it is certainly not the owners of the properties concerned. Nor does there appear to be any recognition that it is generally the principal reception rooms (those on the lower floors) that are worst affected, and where the loss of residential amenity will be most felt. Those residents towards the lower (southern) end of Northcote Road are particularly severely impacted by the proposals, largely because of the extreme height of building E3 and its proximity to neighbouring properties. Without a significant reduction in the scale of this building, I urge the planning committee to reject the proposals.</p>	26-Jan-23
569. O	<p>The buildings on the boundaries of Guthrie Road, Northcote Road and A4176 are excessively tall. The elevations are very domineering with little in their design relating to properties in the surrounding area.</p>	26-Jan-23

570. O	<p>For 186 years Clifton was fortunate in hosting Bristol Zoo. Taking words from <a href="http://www.followthebrownsigns.com">www.followthebrownsigns.com</a>, such sites "encompass a huge variety of interesting places to visit, people to meet, things to do and sights to see, seamlessly incorporating all our history, geography, culture and heritage into a little appreciated and massively underestimated tourist network. Each one is important in its own special way and inspiring people to get interested in a variety of different things they didn't even know could be interesting...". Unlike sites that acquired brown signs through accidents of history (National Trust properties are typical examples), the Zoo was founded in the spirit of the words above, for the benefit of local residents. The inheritors of the property now propose to destroy this heritage. One can appreciate why National Trust protection was deliberately made strong, as some owners will contrive "end justifies the means" logic to justify monetizing an asset that means little to them. Sadly there are few brown sign sites to relieve the housing monoculture that makes up most of Bristol. I feel strongly that the city should encourage the Zoo trustees to try much harder to have the site continue in some form as "a permanently established attraction or facility which attracts or is used by visitors to an area and which is open to the public without prior booking during its normal opening hours". [The Traffic Signs Regulations and General Directions 2016]. Wild Place Project, 6 miles north, has nothing like the pedestrian catchment area. One way the Council can do this is by refusing thoughtless and insensitive plans. The many objectors to the proposed conversion to a housing estate make it obvious that the interior and exteriors of the numerous functional blocks of flats completely fail to measure up to the aspirations of current local residents for future residents. I urge the committee not to acquiesce in the creation of such an uninspiring collection, on a site with such potential. Even if some of the site has to be sacrificed to housing, given the conservation area context the bar for planning committee approval should be high eg a design that could be a serious submission for a Housing Design or Civic Trust Award. I don't believe that the planning committee should feel pressured into giving a quick assent, as owners themselves can be unhurried in pursuit of their objectives (as an example, planning consent for the nearby 2-16 Clifton Down Road site was given in April 2020, but building work has not yet started). Please reject the application, and give time for alternative proposals to be more fully developed.</p>	27-Jan-23
571. O	<p>The revised proposals have minimal changes. The interior of the flats has been amended, but little change has been made to the heights and massing of the buildings. This is a particular issue for Northcote Road and Guthrie Road where five to six storey buildings are proposed where currently the buildings are three to four storeys high. The development does not reflect the existing architecture or the historic nature of the site and area. The number of dwellings across the site will also have a significant impact on the amount of traffic in the area and on road safety, both during the construction phase and thereafter. Whilst I understand that this is an opportunity for the Zoo to safeguard its long-term future, it is very disappointing that the proposals are less than sympathetic to their surrounds and that little consideration has been given to innovative and thoughtful design and how it can sit well within a Conservation Area. I therefore strongly oppose this development for the reasons listed above and in my original objection of 6 July 2022.</p>	29-Jan-23

572. O	<p>I am writing this because I strongly object to the development of Bristol Zoological Gardens into housing. It has so much community value and cultural significance that Bristol and England would lose forever and never be able to replace it. Generations of Bristolians have first learnt about nature and developed a lifelong love and understanding of the environment at the Bristol Zoo . Many of us voted for green councillors, and expect them to strongly and unequivocally oppose this application on ecological grounds as there can be no justification for turning a conservation zoological garden into flats with all the environmental damage of the relocation of the site and the subsequent additional driving and both in the clifton conservation area and by everyone in Bristol that has to drive to take their children to south Gloucester Zoo. This will harm the generations to come by depriving an opportunity to learn by observation and interaction. The new South Gloucester Zoo is destined to fail as it is a terrible experience. Something people would do once or twice unlike the current Bristol zoo site being somewhere that you meet regularly. Its new site already has terrible numbers and with the current Trustees in charge will most probably be deemed more profitable as housing within a few years. I believe with the right people in charge of the zoo it would still be a thriving well loved financially viable zoo and I believe it could be again. I believe that the Shareholders, the councillors and the public have been misled into believing this is inevitable as the trustees try to present it as a fait accompli. The zoo needs to change and adjust to modern expectations. Instead of building another zoo the focus should be on relocating the larger animals and focussing on community engagement and environmental education. These listed buildings are of historic importance and I believe there are many ways this busy and popular site could have been monetized through new innovative environmental exhibitions and attractions. Instead of long term planning to fund an additional unwanted Zoo with the expectation the original could be sold for profit. It is not surprising that trustees are from property development businesses because if you ask a property developer how you make money at a zoo that they say build some housing. It is clear that this application needs to be refused but it looks like there should also be an enquiry into how this has come about. The lack of community engagement, lack of transparency, and the misleading of all local stakeholders. The remit of the Zoo and the local council is to protect the environment that we live in and amenities that we have access to. Despite having one of the more green councils we have seen the steady decline in central Bristol attractions that can be walked to while replacing with car only accessible alternatives. West Bristol is particularly badly catered for now with council releasing the Lido into private exclusive ownership, The Icerink into student flats, and community centres long disappeared. Please protect the Zoo from this shameless profiteering and destruction of a well loved historical community resource.</p>	29-Jan-23
--------	---	-----------

573. O	<p>I am writing to you because I strongly object to the development of Bristol Zoological Gardens into housing. It has so much community value and cultural significance that Bristol and England would lose forever and never be able to replace it. Generations of Bristolians have first learnt about nature and developed a lifelong love and understanding of the environment at the Bristol Zoo . Many of us voted for green councillors, and expect them to strongly and unequivocally oppose this application on ecological grounds as there can be no justification for turning a conservation zoological garden into flats with all the environmental damage of the relocation of the site and the subsequent additional driving and both in the clifton conservation area and by everyone in Bristol that has to drive to take their children to south Gloucester Zoo. This will harm the generations to come by depriving an opportunity to learn by observation and interaction. The new South Gloucester Zoo is destined to fail as it is a terrible experience. Something people would do once or twice unlike the current Bristol zoo site being somewhere that you meet regularly. Its new site already has terrible numbers and with the current Trustees in charge will most probably be deemed more profitable as housing within a few years. I believe with the right people in charge of the zoo it would still be a thriving well loved financially viable zoo and I believe it could be again. I believe that the Shareholders, the councillors and the public have been misled into believing this is inevitable as the trustees try to present it as a fait accompli. The zoo needs to change and adjust to modern expectations. Instead of building another zoo the focus should be on relocating the larger animals and focussing on community engagement and environmental education. These listed buildings are of historic importance and I believe there are many ways this busy and popular site could have been monetized through new innovative environmental exhibitions and attractions. Instead of long term planning to fund an additional unwanted Zoo with the expectation the original could be sold for profit. It is not surprising that trustees are from property development businesses because if you ask a property developer how you make money at a zoo that they say build some housing. It is clear that this application needs to be refused but it looks like there should also be an enquiry into how this has come about. The lack of community engagement, lack of transparency, and the misleading of all local stakeholders. The remit of the Zoo and the local council is to protect the environment that we live in and amenities that we have access to. Despite having one of the more green councils we have seen the steady decline in central Bristol attractions that can be walked to while replacing with car only accessible alternatives. West Bristol is particularly badly catered for now with council releasing the Lido into private exclusive ownership, The Icerink into student flats, and community centres long disappeared. Please protect the Zoo from this shameless profiteering and destruction of a well loved historical community resource.</p>	29-Jan-23
--------	---	-----------

574. O	<p>I am objecting again to the proposed development as it contravenes the Bristol Development Framework Core Strategy Policy BCS22 by failing to 'safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance', namely the site of Bristol Zoo Gardens. The modifications to this Application are minor and are clearly contrary to BCS 22. The proposed development is over intense, unsympathetic to the period and style of the adjacent buildings and negatively impacts them. It will adversely affect this part of the Clifton Conservation Area and the setting of its listed buildings, views shared by Bristol City Council's Conservation Advisory Panel. The National Planning Policy Framework states that heritage assets should be sustained and enhanced and that 'great weight should be given to the asset's conservation' (para 199). It continues that 'local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.'(para 206). This proposed development does not ensure this or meet these criteria. There is a shortage of affordable housing in Bristol and it is very disappointing that the provision in this scheme will be reduced by half so that the work can start more quickly and a greater number of non-social housing residents can cover the ongoing costs of the long-term maintenance of the site. This appears to be a back handed way of reducing the affordable housing provision which obviously does not generate the level of income that the other units might do. This approach is both short sighted and short-termist. The issues caused by traffic from the 196 proposed units will severely impact the area around the site. It is naïve to expect that residents will not have cars and those numbers are likely to be higher than the numbers suggested by Bristol City Council's calculations. The area already has traffic issues at school drop off and pick up times. It is also an area that is frequented by school children throughout the day. The amount of traffic that this development will produce will lead to it being unsafe for school children (4-18 yrs olds) to circulate during the day. The views of Northcote Road as submitted on 13 January are very deceptive. They present Northcote Road, with the proposed development, as light and airy. The road is not like that now even on a bright, sunny day. The views also omit to show the southern end of Northcote Road with the extreme height and massing of building E3. The views presented by the developer are misleading and misrepresentative and do not clearly show the effects of the height and scale of the proposed development. Building E3's height and location has not changed. It remains domineering and overbearing. Its scale and height dwarfs the other buildings in Northcote Road (see doc. BZG-PPA-ZZ-ZZ-DR-A-2602-PL1) including no 1 and no 2 Northcote road, both tall, substantial Victorian houses. Building E3 is significantly taller (8m measured to the eaves) than these and will block more light from Northcote Road due to E3's extreme height. The overall massing and scale of the proposed buildings on Northcote Road need to be reduced to ensure more light reaches Northcote Road and for reasons of safeguarding as they look directly onto the school and a number of its boarding houses. I strongly object to the proposed development in its current form and ask that it is rejected by the Planning Committee.</p>	29-Jan-23
--------	---	-----------



575. O	<p>I am objecting to these proposals as a parent for the following reasons: 1. Road Safety. I have serious concerns about road safety as the scheme is in close proximity to a large school consisting of both day and boarding pupils. The pupils are obliged to move around their campus to access different classrooms, sports fields etc. and the proposed scheme will cause an increased level of traffic, both during the construction phase and afterwards. This will jeopardise the safety of children moving around their school site. The entrances proposed for Guthrie Road and Northcote Road will have a particular impact as they are two of the main areas where parents pick up and drop off children. At peak times, there are already traffic jams, poor parking and bad driving and this will only be exacerbated by an increased number of cars. Entrances here are likely to significantly increase the risk of accidents to school children. 2. Parking. The scheme proposes 201 dwellings with 120 car parking spaces. This will not be enough parking spaces. While it is desirable and necessary to reduce car use, the reality is that most households have at least one vehicle. Where are these extra vehicles going to park? Again, the impact of this is increased traffic on the roads around the Zoo looking for parking spaces and once again, there will be an increased risk to children's safety. 3. Design. The design of the buildings is poor and lacks harmony in relation to its site. The surrounding Conservation area and the buildings adjoining the site consist of detached houses and imposing, listed school buildings broken only by trees and green spaces. These bear no relation to the proposed scheme which does not sit comfortably in this context. The buildings are too tall, overbearing and constitute a solid mass with no redeeming features. Inspiration seems to have been Stalinist Russia with a few plants added, perhaps to soften the corners, or to allude to the listed gardens that once occupied the site. The scheme does not reflect or relate to the pink sandstone of the neighbouring buildings, nor does it relate to the materials and colours of the Zoo's perimeter wall. Its sits in ugly contrast with its surrounds and will be an eyesore that is likely to date quickly. The new buildings are concentrated around the perimeter of the Zoo's site causing neighbouring houses, school playgrounds and boarding houses to be completely overlooked. In some instances, the new buildings are taller than the existing houses and the school being overlooked is a safeguarding issue. Will all the windows overlooking the school have opaque or frosted glass? This scheme is an opportunity to develop an historic and much-loved Bristol site. It is an opportunity to come up with innovative and thoughtful design, showcasing how a contemporary development can enhance a site bound by Conservation Area regulations. This scheme fails on all counts. It is pedestrian, lacklustre and is missing the vision and thoughtful consideration given to the historical context and site surroundings in local developments, such as the ss Great Britain and Wapping Wharf.</p>	29-Jan-23
--------	--	-----------

576. O	<p>I want to voice my objection to the current plans for redevelopment on the old and historic Bristol Zoo site. The proposed development at the site is very disappointing and completely out of keeping, not only for within Clifton and the local area, but in the historic site of Bristol Zoo itself. The proposed development dwarfs the current Zoo buildings and boundary walls (which are not small) and will lead to the new buildings being very imposing. Unless the proper protections are put in place any public areas which are kept could be removed again in the future, taking away public access to the historic site and important green area of the city. I am not against the redevelopment of the site but the current plans need to be significantly altered before they are acceptable. Also, current TPOs seem to have been completely ignored. This is a clear indication of the lack of care the developer is showing towards, not only the site, but the local area and residents.</p>	29-Jan-23
577. O	<p>Having reviewed the plans for the new development on the former site of Bristol Zoo I would like to register my objection to the plans in their current format. More should and must be done to work with the historic character of the site rather than in spite of it. This is especially the case for the characterful walls of the former zoo, which give it much of its distinctive personality and clear link to its former use/history (much like the old city walls). This link to its previous use will become all the more important as time passes and generations lose memory with the site's original use. Currently, the plans create an overbearing fortress rather than an inviting walled garden or park. The design is currently more suited to the industrial warehouses of the docks or paintworks than a former low height zoological gardens. This does not appear sympathetic or in keeping and creates little distinctions between the different city neighbourhoods and their characters. As such, the development as proposed would have an overbearing impact at street level especially due to the height, cladding design and scale of the proposed blocks. It is also unclear what combination of facilities will support the new residents to make a liveable, walkable city and draw in natural foot traffic from non-residents (e.g. a GP surgery and other mixed use facilities other than the park). There appears to be an excessive amount of trees being felled which are covered by TPOs. Again this appears to indicate a lack of working with the site, with TPOs trees being seen as an easily overcome hurdle than a feature worth preserving. Bristol has been doing much in recent years to positively deal with the legacy of previous developments. The plans in their current format are more akin to the rushed post-war reconstruction/infill of bombed out Bristol than a modern, sustainable and liveable city development. This is something that the city has spent many of its recent years attempting to reverse and the plans in their current format would be a step backwards to the ill thought out blocks of the 60s and 70s.</p>	29-Jan-23

578. O	<p>I am writing this because I strongly object to the development of Bristol Zoological Gardens into housing. It has so much community value and cultural significance that Bristol and England would lose forever and never be able to replace it. Generations of Bristolians have first learnt about nature and developed a lifelong love and understanding of the environment at the Bristol Zoo . Many of us voted for green councillors, and expect them to strongly and unequivocally oppose this application on ecological grounds as there can be no justification for turning a conservation zoological garden into flats with all the environmental damage of the relocation of the site and the subsequent additional driving and both in the clifton conservation area and by everyone in Bristol that has to drive to take their children to south Gloucester Zoo. This will harm the generations to come by depriving an opportunity to learn by observation and interaction. The new South Gloucester Zoo is destined to fail as it is a terrible experience. Something people would do once or twice unlike the current Bristol zoo site being somewhere that you meet regularly. Its new site already has terrible numbers and with the current Trustees in charge will most probably be deemed more profitable as housing within a few years. I believe with the right people in charge of the zoo it would still be a thriving well loved financially viable zoo and I believe it could be again. I believe that the Shareholders, the councillors and the public have been misled into believing this is inevitable as the trustees try to present it as a fait accompli. The zoo needs to change and adjust to modern expectations. Instead of building another zoo the focus should be on relocating the larger animals and focussing on community engagement and environmental education. These listed buildings are of historic importance and I believe there are many ways this busy and popular site could have been monetized through new innovative environmental exhibitions and attractions. Instead of long term planning to fund an additional unwanted Zoo with the expectation the original could be sold for profit. It is not surprising that trustees are from property development businesses because if you ask a property developer how you make money at a zoo that they say build some housing. It is clear that this application needs to be refused but it looks like there should also be an enquiry into how this has come about. The lack of community engagement, lack of transparency, and the misleading of all local stakeholders. The remit of the Zoo and the local council is to protect the environment that we live in and amenities that we have access to. Despite having one of the more green councils we have seen the steady decline in central Bristol attractions that can be walked to while replacing with car only accessible alternatives. West Bristol is particularly badly catered for now with council releasing the Lido into private exclusive ownership, The Icerink into student flats, and community centres long disappeared. Please protect the Zoo from this shameless profiteering and destruction of a well loved historical community resource.</p>	29-Jan-23
--------	---	-----------

579. O	<p>I am writing to you because I strongly object to the development of Bristol Zoological Gardens into housing. It has so much community value and cultural significance that Bristol and England would lose forever and never be able to replace it. Generations of Bristolians have first learnt about nature and developed a lifelong love and understanding of the environment at the Bristol Zoo . Many of us voted for green councillors, and expect them to strongly and unequivocally oppose this application on ecological grounds as there can be no justification for turning a conservation zoological garden into flats with all the environmental damage of the relocation of the site and the subsequent additional driving and both in the clifton conservation area and by everyone in Bristol that has to drive to take their children to south Gloucester Zoo. This will harm the generations to come by depriving an opportunity to learn by observation and interaction. The new South Gloucester Zoo is destined to fail as it is a terrible experience. Something people would do once or twice unlike the current Bristol zoo site being somewhere that you meet regularly. Its new site already has terrible numbers and with the current Trustees in charge will most probably be deemed more profitable as housing within a few years. I believe with the right people in charge of the zoo it would still be a thriving well loved financially viable zoo and I believe it could be again. I believe that the Shareholders, the councillors and the public have been misled into believing this is inevitable as the trustees try to present it as a fait accompli. The zoo needs to change and adjust to modern expectations. Instead of building another zoo the focus should be on relocating the larger animals and focussing on community engagement and environmental education. These listed buildings are of historic importance and I believe there are many ways this busy and popular site could have been monetized through new innovative environmental exhibitions and attractions. Instead of long term planning to fund an additional unwanted Zoo with the expectation the original could be sold for profit. It is not surprising that trustees are from property development businesses because if you ask a property developer how you make money at a zoo that they say build some housing. It is clear that this application needs to be refused but it looks like there should also be an enquiry into how this has come about. The lack of community engagement, lack of transparency, and the misleading of all local stakeholders. The remit of the Zoo and the local council is to protect the environment that we live in and amenities that we have access to. Despite having one of the more green councils we have seen the steady decline in central Bristol attractions that can be walked to while replacing with car only accessible alternatives. West Bristol is particularly badly catered for now with council releasing the Lido into private exclusive ownership, The Icerink into student flats, and community centres long disappeared. Please protect the Zoo from this shameless profiteering and destruction of a well loved historical community resource.</p>	29-Jan-23
--------	---	-----------

580. O	<p>I fully support the comments below as put forward by save bristol zoo campaign. We desperately need exciting ways to enhance the lives of Bristolians to improve their wellbeing and overall mental health. Squeezing more houses into an already over crowded city will not achieve this. There have been great alternatives put forward, particularly the ground breaking virtual zoo concept, that would be such a great attraction for our city and bring much needed tourist income. Please think strategically and conserve this unique site - a site that deserves so much more than just more boring houses that will only benefit a few. Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	30-Jan-23
581. O	<p>Application no, 22/02737/F I am writing to object to the proposed development of the Bristol zoo site on the grounds that the area isn't suitable for housing. The buildings proposed are not in keeping with the area. Mr Alexander Bruce Resident of College Rd</p>	30-Jan-23
582. O	<p>This proposal is entirely inappropriate for the area.</p>	30-Jan-23
583. O	<p>This is such a great opportunity wasted - we don't need more housing as much as we need stimulating activities for us all. The other non-housing related proposals offer so much more in terms of tourism, genuine sustainability during a climate emergency, and amenity to the whole of the Bristol population and beyond. We owe it to the legacy of Bristol Zoo to replace it with something innovative, fun, and engaging, supporting people's mental and physical health. There are plenty of other sites for housing that are better suited to such purposes. PLEASE save this precious and historic space and amenity for generations to come - something Bristol can be proud of. Thank you.</p>	30-Jan-23

584. O	<p>We OBJECT to the above planning application for the following reasons - Out of keeping with the conservation area - Over developed and way too high buildings - Overlooks the boarding houses and playgrounds of Clifton College so is a safety hazard and completely unacceptable. - Congestion of an extra 200 residents in the roads already very congested, there are not enough parking spaces provided within the development and the surrounding roads are already congested enough. - Extra traffic is a safety issues to both Clifton College and Clifton High School - Demand on services, hospitals and doctors in the area are already oversubscribed - Schools in the area are already oversubscribed - The strutures proposed are too tall and cover the whole perimeter of the existing zoo, a block of grey is incredibly ugly and out of keeping for this area of outstanding beauty with Durdham Downs. - 4-6 storey buildings proposed, a 6 storey building on the northern boundary by the Downs is completely unacceptable for local historic buildings and architecture and completely out of keeping. - The plans drawn up are deceptive and shown green space in the middle, however the whole perimeter is surrounded with a mass of 4-6 storey buildings looking into Clifton College and surrounding houses gardens, bedrooms etc</p>	30-Jan-23
585. O	<p>The proposed redevelopment of Bristol Zoo Gardens is completely out of keeping for the conservation area of Clifton. The modern blocks of flats above the perimeter walls tower above the street and gardens. These monolithic blocks are entirely incongruent with our area in design, scale, mass and form. They will overwhelm the gardens and obliterate street views of the sky, mature trees and the glimpses of historic buildings that characterise Clifton. A construction project on this scale in a conservation area will completely detract from the desirability and preservation and enhancement of the character of the area. The scale and design may be suitable in a city centre, but is surely inappropriate for our conversation area and looks like something more suitable for Disneyland with hideous balconies with stencils of animals and a humongous 6 storey high green brick giraffe on the side of a building. We were led to believe that the sale of the Zoo Gardens was to pay for new enclosures at Wild Place, but this does not seem to be the case as only the Gorillas and one species of lemur are being relocated! The rest have been shipped off to other zoos, this was not the impression we were given when the Zoo needed to maximise the value of this site. The Zoo is retaining some communal garden space, but it is expected that over 150 mature trees will be removed for this hideous proposed development along with the historic ornamental garden. The towering blocks of flats around the perimeter will not make the communal garden space desirable. The proposed housing development on the north side along Clifton Down and the east side Northcote Road show a building of almost 300 metres of monolithic, uninterrupted block of flats up to 6 storeys high, towering over the existing high perimeter wall and dominating the neighbouring historic buildings. On the north side along Clifton Down from the historic zoo entrance is 150 metres of monolithic, uninterrupted blocks of flats rising to 6 storeys high, some 60ft taller than existing high perimeter walls. Along Guthrie Road near Clifton College's historical buildings the scale is once again overwhelming and completely out of keeping for an area like Clifton in a conservation area. It has to be opposed until a more moderate low level development (3 storeys high max) is proposed that is in keeping with the conservation area and not in some cheap brick with giraffes on the side which is</p>	30-Jan-23

	<p>completely out of character with the bath stone and other quarried stone already seen so much in the surrounding roads.</p>	
--	--	--

586. O	<p>The issues caused by traffic from the 196 proposed units will severely impact the area around the site. It is naïve to expect that residents will not have cars and those numbers are likely to be higher than the numbers suggested by Bristol City Council's calculations. The area already has traffic issues at school drop off and pick up times. It is also an area that is frequented by school children throughout the day. The amount of traffic that this development will produce will lead to it being unsafe for school children (4-18 yrs olds) to circulate during the day. The views of Northcote Road as submitted on 13 January are very deceptive. They present Northcote Road, with the proposed development, as light and airy. The road is not like that now even on a bright, sunny day. The views also omit to show the southern end of Northcote Road with the extreme height and massing of building E3. The views presented by the developer are misleading and misrepresentative and do not clearly show the effects of the height and scale of the proposed development. Building E3's height and location has not changed. It remains domineering and overbearing. Its scale and height dwarfs the other buildings in Northcote Road (see doc. BZG-PPA-ZZ-ZZ-DR-A- 2602-PL1) including no 1 and no 2 Northcote road, both tall, substantial Victorian houses. Building E3 is significantly taller (8m measured to the eaves) than these and will block more light from Northcote Road due to E3's extreme height. The overall massing and scale of the proposed buildings on Northcote Road need to be reduced to ensure more light reaches Northcote Road and for reasons of safeguarding as they look directly onto the school and a number of its boarding houses. I strongly object to the proposed development it is all too high and out of keeping for the conservation area and historical buildings are lost.</p>	30-Jan-23
--------	---	-----------



587. O	<p>Whilst I consider that it is a shame that Bristol Zoo feels it must move from its historic and easily accessible site in Clifton to a much more remote and unsustainable location adjacent the M4 motorway as this seems rather contrary to its ecological and conservation objectives, I broadly welcome these proposals. This is because I believe that a carefully designed residential development is the best alternative use of this site. I also consider that it is laudable that the applicants seek to maximise the number of dwellings present and at the same time preserve its gardens. Likewise, I welcome the potential to reduce fly-parking arising from the removal of the Zoo. Nevertheless, I have many concerns about these proposals as they stand. My primary concern is that the buildings are too tall and will overshadow the adjoining properties and dominate this part of Bristol. Thus even a casual visit to the area in which the Zoo is situated will indicate that with the exception of the prominent landmarks provided by several church towers, the Cathedral Spire and the tower of Clifton College, the buildings surrounding this site are of a relatively uniform 3 or 4 storey height. This is true not only of the immediately adjacent area, but of most of the Clifton and Clifton Down areas. As this is not true of the current proposals and I fear the that will visually dominate this area unacceptably. I consider this to be particular problem in respect of Clifton College where it seems that the range of historic buildings adjacent to Guthrie Road will dominated by the new buildings and this will ruin the College's setting by creating an unwelcome intrusion into its backdrop from the south. Whilst placing the taller buildings on the northern site of the site where the ground rises would seem to be sensible, those on the other sides must not be allowed to overshadow the existing buildings on Guthrie, Northcote and College Roads. The current proposals fail in this respect. Likewise, a casual visit to the area in which the Zoo site is located will indicate that most of the building are constructed in the warm colours provided by red sandstone and creamy limestone walls. However, the current proposals seem to be finished in a rather drab cold colour more befitting of a 1970s multi-storey municipal car park than this location and they will do little to enhance its appearance. I notice that the brochure I have receive makes a play of the fact that this development will sit 'sympathetically within the walled gardens' already on the site. To be successful this development must also be sympathetic to the area outside this wall and in this respect, I consider that it fails dramatically. So more need to be done to harmonise this development with its wider surroundings and not just eth former zoo site itself. Consequently, whilst I would not wish to see a pastiche of the surrounding Victorian architecture, I feel a design more in keeping with its neighbourhood in terms of height and colouration could readily be devised. Hence, I feel it rather smacks of something being parachuted in from outside with little thought for its neighbours and needs to be significantly changed. I also consider that Guthrie Road is very busy with Clifton College pupils in term times and so steps must be taken to maximise their safety during the construction of this development. This could best be achieved by the implementation of a Construction Management Plan. As I note that no such document is provided in spurt of this application, I would suggest that it is necessary to devise one forthwith. This strategy must be based on the premiss that works access to the site is obtained only from Clifton Down Road and the large vehicle are not routed through the surrounding residential areas. Overall, therefore, whilst this proposal has much to commend it, I feel that it has a number of fairly obvious shortcomings which must be addressed before it is approved. Under these circumstances I must object to it. Paul Johnson Town and Transport planner</p>	30-Jan-23
--------	--	-----------

588. O	<p>I am disappointed to note that the latest proposal are very little changed from their predecessors meaning that the chance to create a feature which enhances the locale is being lost. It is difficult to see why the promoters are continuing to believe that grey is a sensible colour for such a prominent development as it more suited to bunkers, machine-gun nests, multi-storey car parks, gasworks and other such utilitarian structures. Indeed, its hard to believe that anyone who has spent any time at all in Bristol has noticed that it rains a fair bit and so the use of warmer colours is highly desirable. In short the local residents are the people who will have to live with this development and their opinion on its appearance deserves to take precedence over imported architects. Regards Paul Johnson</p>	30-Jan-23
589. O	<p>I have previously commented on the plans to redevelop Bristol Zoo for residential purposes and whilst I was broadly supportive to these proposals, I was very disappointed with the unpleasant visual aspects of the proposed design. As a long-standing local resident is a matter of great concern that the unsightly eyesore which constitutes this design has not been significantly modified in the latest proposals. Indeed, it is hard to discern what changes have been made and good design cannot be replaced by the meaningless spin set out in the Design Guide. Therefore, I must continue to express my disgust at the unsympathetic nature of these proposals which are wholly out of keeping with the surrounding historic area. I must also emphasis that successful design does not stop at the site boundary but must produce a development which fits into the local environment comfortably. The current proposals fail on these grounds and so should not be allowed to proceed unmodified. Moreover, permitting this ill-fitting development to proceed, will set an unhealthy precedent for the future and could easily lead to a rash of similarity ill-conceived development proposals in the Clifton district which will destroy the ambience of the local area. Hence, the applicant should think again and devise something more keeping with the situation of the site.</p>	30-Jan-23

590.	O	I object to the proposed plan because: The proposed medium rise buildings are out of character with the surrounding area. 'Affordable ' and 'for social rent' are not defined in the plans. Few houses, as opposed to flats, are planned. Those that are, will no doubt be astronomically expensive as houses in Clifton always are. This debunks the claim that the zoo sale will provide, admittedly, much needed housing ie houses, not flats, in Bristol. There are already plenty of flats available for private rent in Clifton , at similar prices to other parts of the city. Only some of the accommodation that is planned will have access to on road or off road parking. Although the bus service has improved, this means that the accommodation is less likely to be suitable for families. The proposal that the residents' service charges will fund the upkeep of the public garden is unsustainable in the long, or even medium term . Only a small proportion of the beautiful and historic gardens are to be retained, presumably the lawn and other easy to maintain areas. Instead of planning permission for an inner city, densely populated housing estate , the council should have bought or helped to buy the site to keep the gardens, accessible to the public for a small annual fee. Alternatively a body, such as English Heritage it the National Trust could have taken over the gardens.	30-Jan-23
591.	O	I cannot see a significant difference between the revised and original plans, which I have already objected to. These plans are for an up market housing estate with few units large enough to accommodate families. There are already plenty of similar sized apartments in Clifton available to buy or rent. The design of the blocks is totally out of character with the surrounding conservation area. It is unlikely that the gardens, which will initially be available for public use, will remain so in the future. Many trees will be cut down. The herbaceous border within the zoo gardens, will be bulldozed, in spite of it being award winning and also, over the years, has had the ashes of loved ones scattered on its soil, with the zoo's permission. The twenty per cent of affordable units will still be too expensive for key workers, at eighty percent of their market price. Some wealthy developer will gain from these plans, not the people of Bristol.	30-Jan-23
592.	O	Do we not have enough overpriced houses, or flats in this area. Part of the reason we moved here is because of these beautiful historic places.	30-Jan-23
593.	O	Keep area clean air, housing means cars and pollution, historic building and gardens need to be kept for city heritage and future generations pleasure. Little available centrally apart from this and museums for out children, developers should make houses in outer Bristol area and invest in public transportation.	30-Jan-23
594.	O	i think that the develoment is to big not in keeping with the area . Also there not enough social housing being made available .	30-Jan-23

595. O	<p>Dear Bristol City Council, Bristol Zoo's well-loved, animal park and historical gardens will be forever lost to the people of Bristol if this application is approved. A city is not just a place to work so that you can pay a mortgage on some over-priced housing - it is a place to live and live well. Bristol needs attractions and spaces for all members of society including the youngest and the oldest to enjoy. The Zoo has served this purpose since 1836 and there seems to be no good reason for stopping now. Bristol Zoo is so much more than gauping at some caged animals. It's a place where small children can run around safely, where picnics can be had on the lawns while learning about parrots, splash about in the water features on hot summer days, walk through a jungle and feed the parakeets from your hand or stroll through the butterfly enclosure. Sure, times change and the concept and the role of zoos naturally have to change as well. But just closing down is not in the public interest. ( But very much in the interest of property developers that have smelled a nice and profitable opportunity ). The Wild Place has never been remotely close to a replacement for many reasons, but above all how inaccessible it is. Firstly, it is not in Bristol, but by a major motorway junction in South Gloucestershire. Try to get there if you don't want to or can not drive. It involves an hour's bus journey from central Bristol and a miserable walk from an out-of-town shopping centre and crossing the M5. The Wild Place claim that it is "an easy 15 walk" but I challenge you to attempt that with a tired toddler and granny with walking aids. If Bristol is so keen to hit net zero and wants to encourage active or public travel, why close down one of the few attractions that can be enjoyed by all, at any time of the year, that is within easy reach? The planned housing will not make a dent in the housing crisis but will create some extra luxury appartments in an already exclusive address. The trustees of the Zoo have failed in their duty to safeguard and run this wonderful little oasis. I want this planning application to be rejected and the site to be returned to public use.</p> <p>Yours sincerely, Liv Franzén</p>	30-Jan-23
596. O	I object to the redevelopment proposal	30-Jan-23

597. O	<p>Some will be familiar with Peter Self's article on planning for the new London airport in the 1960's "Nonsense on Stilts", in which he argued that the criteria for the location would favour Hyde Park. But there is, as yet, no London Airport in Hyde Park. Here, we would have a similar instance of an agglomeration of buildings to be dropped in the wrong place - wrong on aesthetic and heritage grounds, but that also fail to meet criteria for a holistic assessment of the total carbon budget: embodied carbon, but also in terms of motorised transport and congestion. The decision to build on this land presents an irreversibility and a 1960s-style proposal. It does not appear that the option of running Bristol Zoo on two sites has been given adequate consideration. The benefits for children of pedestrian, bicycle or bus access would keep a safely accessible zoo in Clifton. Children often prefer to study small mammals, fish and insects, however much they love the megafauna. The Clifton Zoo should remain open. Bristolians will have their right to participate in a proposed removal of a historic public good - if you will, its enclosure, the term not accidentally the same as that of the Scottish experience. In the '20 Ideas for Bristol' exhibition in the late 1970s, in cooperation with Bristol Zoo, the Bristol public showed their flair for new ideas, the legacy of which is visible today in Sustrans' cycle paths, the retention of the cranes on the docks, the ferry services, yet in the proposed enclosure and sale - to whom we know not - of our heritage, we have no say in alternatives, in spite of the various constructive alternative proposals already made. There is, to my knowledge, no comparable example worldwide of selling off a public good, an asset that happens by chance to be at the disposal of decision-makers who appear to be guided by the values of property developers rather than zoologists (and the Zoo's Director is an archaeologist, not a zoologist). Many of the proposed mitigating factors - restrictions on parking, the proportion of affordable housing etc., or the guarantee of public access to the site, will be up for negotiation after the sale. If new residents padlock the gates, there will be scope for civil disorder, or the public will simply be forced out. The proposal fails as it stands to satisfactorily account for its long-term carbon budget. It will impose strains on local services. It will reduce the attractiveness and value of surrounding properties. Crucially, a public good that has lasted for 186 years will be stolen from the community, 'enclosed', without due consideration of alternatives and their economic, environmental and educational benefits. An opportunity to enhance the image of the City, and its attractiveness to visitors, will have been squandered. And the loss of green space and trees, recognised as sources of health and mental wellbeing to urban residents, will be similarly irreversible. There remain, of course, questions of possible conflicts of interest of key decision-makers, which are presumably outwith the considerations of the Planning Committee, but I do hope that a community asset that I have valued all my life can be retained. Until the case for change of use is proven, permission should not be granted.</p>	30-Jan-23
598. O	<p>The zoo is a community (whole city) resource, and this zone of the city should remain as an amenity for all. The present plans are essentially for a select private dwelling complex. The zone must be kept as a city-wide resource, with ecology and biodiversity as its core function.</p>	30-Jan-23
599. O		31-Jan-23

600. O	<p>As a lifelong Bristol resident and parent I very strongly object to this proposal and to the principle of privately developing this historic and important public amenity. Aside from its historic and environmental importance, there are few spaces in the city where children have a space safe from traffic to play and run around, and to have contact with nature. Bristol Zoo Gardens is one of those sites. It has been so for generations of Bristol families and should remain so for generations ahead. Regardless of what happens to the animals, this site is a historic and important space for all Bristolians and should remain as a public amenity in perpetuity. Turning this site over to housing, destroying both architectural heritage and natural space and removing it as an educational, open space for all to access, would be a crime in my opinion. I have read the evidence regarding BZGs accounts and other reasons for wanting to close the site and do not believe a strong case has been made. In fact, there seem to be many unanswered questions and inconsistencies. There would need to be a far more robust case made for any change of use before an irreversible decision was made that would take away a unique, precious and much-loved place from future generations of Bristolians.</p>	31-Jan-23
601. O	<p>As a long-term resident of Clifton I wish to strongly object to the BZG plans for the zoo's redevelopment. I regard the zoo as one of the most special places for the public to visit in Bristol, with its long history of education and conservation regarding the animal kingdom and its historic gardens. Because it's in Clifton, it is easy to visit by public transport and has always been a much loved and well used place for families. Wild Place is only really accessible easily by car which makes it a much less attractive option for Bristol families. I am also sceptical of the potential range of animals which will be housed there. I would be surprised if there have penguins or seals, for example, or an aquarium, all of which educated visiting children over the years. Having read the BZG's reports, I do not believe there was ever a financial case for the zoo to close, and I think this should be revisited. If it can't remain as a zoo, then the site should remain a public amenity in perpetuity. I am not convinced that it will remain as this if the development is allowed. The houses/flats will be expensive and I think with the passage of time, the wealthy owners will object to the public having continued access. The planned density and height of the proposed housing is totally unsuitable to this site. Bristol does have a significant housing shortage but there will be only 20% affordable housing. This development will not make much difference to the shortage, providing instead more housing for wealthy Cliftonians. There will be a loss of at least 80 trees and 31 groups or part groups of trees which contravenes of the Bristol Development Framework Core Strategy Policy BCS22. If Bristol is trying to become a Greener place, with cleaner air and more tree covers, then this is totally wrong.</p>	01-Feb-23
602. O	<p>I object strongly to these plans for housing that have been submitted regarding the site at the Zoo.</p>	03-Feb-23

603.	O	I wish to object strongly to the proposed Plan to change the Zoo Gardens into a housing development. This area comprises many special trees and is a wonderful green area for everyone to enjoy in the future. The area is a national treasure and should be secured for the future. Yours faithfully Sonya Clifton	03-Feb-23
604.	O	Three grounds: Aesthetic. The images suggest that it will be large and overwhelming in this predominantly residential area. The style is incompatible with surrounding buildings (and only consistent with the unattractive blocks of flats around the waterside area. Amenity. This will lead to the destruction of a major local amenity, a much loved and well-tended green space with the loss of a number of mature trees. The idea that residents will continue to pay to support access for outsiders is risible. It is increasingly clear how much green space contributes to the wellbeing of inhabitants Moral. This space exists because it has been supported and loved by Bristol's population for many years. It does not feel correct that this should now be given over to the ownership of a small number of rich people who will be able to buy the flats.	03-Feb-23
605.	O	I object to the plans for development of Bristol Zoo Gardens as currently proposed because: 1. I believe the Trustees of the Zoo have not properly fulfilled their obligations as Trustees to pursue the purpose of the Zoo, but are driven by a profit motive and interest in development of the site instead of being informed by conservation or environmental education. 2. It has not been established that there is a need for change of use or that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. 3. The loss of this site as a communal asset is huge and the plans proposed are unlikely to protect public access in the long term. 4. The design proposed is completely inappropriate in terms of scale and style with the surrounding area. Stylistically the buildings proposed are too massive and unbroken, forming a continuous block out of keeping with the environment of the area. 5. Detriment to and loss of landscape and green space and important trees. This is a significant garden of historic importance and immense value to the urban environment and is listed and an important open space and a Historic park and garden.	03-Feb-23
606.	O	The scale and appearance of the proposed scheme is inappropriate for the location. It does not enhance the conservation area in any way.	04-Feb-23
607.	O	The overbearing appearance of multi-storey flat blocks is not in keeping with the local architecture, especially in a conservation zone. It's such a shame that an iconic piece of Bristol is about to be destroyed.	04-Feb-23
608.	O	The proposed development of the old Bristol Zoo site is entirely out of keeping with the conservation area that it sits within. It is far too big - the scale of the buildings overwhelms those around it and it is the wrong style entirely and out of keeping with its surroundings. Added to this, the loss of green space and mature trees are very sad. The space could be a real value add to the local area, with the right kind of development but this one is not it.	05-Feb-23
609.	O		06-Feb-23

610. O	The design proposed is completely inappropriate in terms of scale and style with the surrounding area. Stylistically the buildings proposed are too massive and unbroken, forming a continuous block out of keeping with the area. It is also detrimental to the landscape and green space and important trees in a significant garden of historic importance and immense value.	06-Feb-23
611. R	I live about 10 minutes walk from the zoo. In my road there are perhaps 10 households who ought to be considering downsizing in the next 10 years, and for whom flats on the zoo site would be most suitable (I'm not interested in 'retirement' flats such as the Vincent development). I know that developers 'try it on', but the artist's impressions that I have seen are a bit tall - lop off one or two floors and all would be well. I suppose I'm an IMBY (in my backyard, please!). Martin Robinson	07-Feb-23
612. O	Bristol Zoo with its historic gates, gardens and buildings have played a huge part in generations of the local community, whilst bringing visitors from further across the UK and abroad. With them bringing financial benefits to the zoo and surrounding area. This historic venue should remain accessible for future generations. The importance of this space, is not just emotional but the plant life is vital to the local ecology. There is much focus on the local area introducing clean air zones and pedestrian only spaces and introducing additional housing will only be detrimental to the local infrastructure. Bristol Zoo and it's gardens has seen generations volunteering to tend the garden space and provide a welcome clean space for children to play and learn. There are many other spaces in the surrounding area that would welcome affordable housing but introducing additional multi-million pound housing will not benefit younger generations battling to enter the property ladder.	07-Feb-23



613. O	<p>I object to this planning application on the following grounds: 1. Loss of trees in a conservation area, many of which will be mature specimens and tree cover is needed amongst all the proposed flats, not only for greenery but also to keep the area cooler in our increasingly hot summers. 2. Design of proposed properties is out of character with buildings in the area. It is reminiscent of the height and scale of the Prora Buildings on Rugen, Germany, supervised by Albrecht Speer, the great Nazi Architect. It will have a detrimental impact on the surrounding Victorian buildings as it imposes a solid wall of buildings, rather than the roof line of a Victorian Terrace. The proposed buildings, especially those in Guthrie Road, will not reflect the wonderful stonework of the College Buildings nor the Music department buildings. A good example of best practice is the new build done by Clifton College at the bottom of the Avenue, where the casual observer would not know this was a complete new build as it matches the surrounding buildings. This was an award winning development. 3. This is overdevelopment in a conservation area and with the proposed number of flats (196), where would all the owners park, which is important as we now all live within a parking scheme that could not absorb that number of cars. 4. This development would overwhelm the streetscape and ruin a once peaceful location in Clifton. It will not enhance the area nor will it reflect the green space it borders (the Downs). The proposals are extremely ordinary and boring, more like a 1960s design for a city centre than a conservation area in Clifton. This proposal is poor and badly thought out. I object totally to this.</p>	07-Feb-23
--------	---	-----------

614. O	<p>Overall Comment The Campaign to Save Bristol Zoo Gardens (SBZG) started with an investigation into how the Zoological Society had made its decision to close the Clifton site and into the business reasons provided. The Campaign found that these reasons which would support their claim that the Zoo was no longer viable on the Clifton site were unfounded. The following points below specify how the application is in breach of planning law and policy. Change of Use not justified The Campaign has enlisted the support of accountants and a former Zoo Director who have confirmed that there is no reason the 186 year old site should not continue in business as a successful visitor attraction. Income, profitability and visitor numbers had all been positive in the decade preceding 2020 and all showed sign of recovery to their pre-Covid levels prior to the Zoo's closure. The picture of the Clifton site as an inevitable failure is false and the decision to sell all their property in Clifton was taken to provide capital funds for their Wild Place Project in Gloucestershire. Both Local Plan policy DM5 and Core Strategy Policy BCS12 make direct reference to the fact that the loss of Community Facilities will not be permitted unless it can be clearly demonstrated that there is no longer a demand for the facility or that the building/s are no longer suitable to accommodate the use and the building cannot be retained or adapted to another community use. Furthermore Policy DM5 goes onto state that the loss of a community facility will only be acceptable if a replacement facility can be provided in 'a suitable alternative location'. The Zoo's own figures indicate that there is still a continuing demand and zoo keepers and zoologists confirm that the site is suitable for certain species of animal. Many alternative community uses have been proposed, ranging from a city farm to an Eden Project style gardens. Sufficient time has not been given to explore these possibilities or their funding. The Wild Place is not a suitable alternative location, requiring car transport, whereas a city zoo is easily accessed by public transport, bicycle or on foot. Ecology and Sustainability The Bristol Tree Forum has already challenged the Zoo's claim of a 38% increase in biodiversity as it is based on outdated methodology. They estimate the outcome to be a 22% net loss. The loss of trees is excessive and experts fear for the remainder when surrounded by building works and then by tall buildings. The proposal to plant '2 for 1' is less than the Council's Tree Replacement Standard. Demolition and rebuilding is not the preferred approach by RIBA due to the loss of embodied energy in demolition and the carbon cost on construction materials. A Bristol environment expert supporting the Campaign estimates the carbon cost of the construction proposed on the site would be equivalent to running the existing buildings for 2500 years. Adaptation or reuse is to be preferred. Public amenity The proposed public access and maintenance of the gardens is to be funded by a levy on the residents. But there is insufficient evidence that this right will be granted in perpetuity as this access is permissive and could be modified or withdrawn. It is the prediction of many objectors to his scheme that the residents will object to funding a public amenity and in time it will become a private space. The scheme provides no long term protection of public access. This could be provided by the dedication of the site for public access in perpetuity under section 16 of the Countryside and Rights of Way Act 2000, which would be binding on subsequent owners. Alternatively, designation as a town or village green. The Zoo could apply for voluntary registration under the Commons Act 2006 Harm to overall historic interest and significance of site The May 2022 Heritage Statement acknowledged the harm that is caused to the site and Conservation Area through the departure of the Zoo from its historic home, a point echoed by Historic England. The SBZG disagrees that this harm is justified by the current proposal. The significance and irreplaceability of</p>	07-Feb-23
--------	---	-----------

the site as a whole is fundamental to this application. Bristol Zoo Gardens is the oldest one in the UK and the fifth oldest in the world. It has been open for 186 years. NPPF 189 states: 'These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'. Loss of Communal Value Defined as 'Value deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.' in English Heritage, Conservation Principles, 2008. At the public level, hundreds of thousands of people have visited the Zoo as children, as adults and with their own children for more than 150 years and the loss of this experience is not to be taken lightly. Additionally, the ashes of many people have been scattered within the herbaceous borders - to be lost under a roadway - while others have held weddings and celebrations in the Pavilion, which will be lost to flats. Harm to listed buildings The original and particular use of many of the buildings is integral to their historic significance and is cited as a key reason in the listing designations of the four animal houses on the site, justifying their listing at Grade II and their national importance. Harm to an asset of this significance should clearly be only as a last resort. The D&A statement refers to 'Historically significant buildings retained and sensitively converted to unique, environmentally sustainable homes'. But the SBZG finds that such conversion would completely change the presentation and significance of these buildings, meaning the loss of: the Clifton Pavilion, Great Aviary/Parrot House, Giraffe House and the Museum/Activity Centre, all to apartments. It is not considered that the applicant has made the case for the level of harm proposed to the listed buildings within the site. Justification of harm It is recognised by the NPPF that new uses are sometimes needed for heritage assets to generate income for their long-term future. In order to do this, it may be necessary to cause some harm, but it is clear that in identifying the 'optimum viable use' for a heritage asset, the optimum viable use is one that causes the least harm to significance. The SBZG argues that the proposed scheme would cause significant and irreversible harm and is not justified. Alternatives Other proposals for the site have been put forward either in broad outline or in detail and this suggests that other schemes are possible. Covid has provided a distraction so that disposal of the site is presented as a finished decision. But this is a nationally important site and time could usefully be taken to allow further time for ideas or to run a competition to determine its future. The Campaign's preference is that it reopens as 'a Zoo fit for the 21st century' which was the Zoo's strategy up to 2020. Design Even if there were no alternative to building densely on the site, the proposal is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over-intensive with a consequential poor relationship with the adjacent school and its listed buildings. The north building at six storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular the Bear Pit would be overly dominated by new development. Landscape Bristol Zoo Gardens are a locally listed heritage asset designated as a Local Historic Park/Garden and an Important Open Space. The Avon Gardens Trust has voiced concerns around the loss of trees, the viability of translocating other trees and

	<p>hedges and the general impact on green infrastructure from ground and environmental disturbance during the long phases of works and the eventual overshadowing from tall buildings. Cars and Parking The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought not least as it creates another visual and psychological barrier for free pedestrian access to the green spaces within the site. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site. SAVE Bristol Zoo Gardens Campaign February 2022</p>	
615.	<p>O I object to the loss of a communal space with established transport and bus links. This space should be preserved for the good of the community as a safe, easy accessible space for families and members of the community to come together. The historic nature of the site is so valuable to bristol and I feel further consideration should be given to options to replace the zoo which also provide the same opportunity for the communities, not only in the local area, but as a central meeting place for families across the city.</p>	07-Feb-23
616.	<p>O This development will mean a loss of communal and green space for the community. It should be conserved as a green recreation space for the community to enjoy.</p>	07-Feb-23
617.	<p>O I object to the plans for the Bristol Zoo Gardens site for a number of reasons: - increased traffic and noise due to increased housing in a conservation area - insensitive/overbearing/gigantic design on edge of a green space and within a conservation area - removal of many mature trees to make way for housing development Please re-consider the change of use to this site and find a more sensitive solution? It's not all about the financial yield from selling large numbers of dwellings - its about developing it sensitively for future generations to admire rather than the incongruous monstrosity currently suggested.</p>	07-Feb-23

618.	O	After a lifetime's association with the Zoo gardens it is extremely sad to see its closure although I completely understand reasons for it. It is no place for large animals but I would have thought great consideration would be brought to this historic and rare site. I understand the beautiful facade will remain but images of proposed huge new buildings are actually very disconcerting. Surely any new build should be strictly in keeping with the surroundings in this very special and rare conservation area. With Bristol so up and coming and very much in the world's eye nowadays surely it is essential to maintain responsibly this exceptionally beautiful and most loved area. The approach to Clifton Village, the Downs and Suspension Bridge should enhance many visitors experience of our beloved City. I am sure someone can produce beautiful plans for new buildings/homes which will be in keeping in size and structure with the area. Tall 'soviet bloc' structures will have the most negative effect. We surely have many imaginative, talented developers and architects who could make this an impressive project and not just about cramming in as many dwellings as possible in the space. I am pleased to know that there will be some recreational public space, but for how long? I am not against progress which is essential but some sensitivity must surely be shown here.	08-Feb-23
619.	O	The closure of Bristol Zoo was a sad event in itself, but along with many others I'm now concerned about the plans for redeveloping the site. The proposed development of nearly 200 residencies in the space the zoo once occupied would be concern enough, but it now appears that the proposed buildings are in no way sympathetic to the area they will occupy. How do blocks of no doubt exclusive flats fit with the character of the surrounding buildings and the area in general? Whilst there may have been sound economic reasons for moving the zoo, surely this site deserves a more fitting and more inspirational development?	08-Feb-23
620.	O	This proposal is not for the good of the community at all. Furthermore, the disruption to the surrounding areas, not least of all the school will be extremely detrimental, for what is, in essence, a high rise development. This entire project is flawed and should not be allowed as will be blight on the neighbourhood.	08-Feb-23
621.	O	I write on behalf of myself and my wife as local residents of many years standing. The proposed development is awful. It is out of scale to its surroundings, overbearing, of no architectural merit, destructive of an historic space and its gardens, and utterly inconsistent with the commitment to high amenity standards in Bristol's Core Strategy and the standards required of development in a conservation area.	08-Feb-23
622.	O	The development is totally out of character in a conservation area. The tall block of flats on Guthrie Road will overlook a school and will lead to inappropriate behaviour with regards the children. The blocks should be much lower and set behind a wall so not visible from the school buildings.	08-Feb-23

623. O	It seems, from local campaign literature, that the designs for housing are not in keeping with the character of Clifton, and do not preserve or enhance the character of the area. Indeed, they appear detrimental. I would request that the design is significantly modified so that it remains in keeping with Clifton, and its Georgian and Victorian architecture. I would also request that the character of the grounds of the Zoo are retained. I did understand from literature produced by the Zoo before its closure, that this was the intention. This, however, no longer appears to be the case. I have no objection to the building of new homes but firmly believe that there should be limited impact on the character of Clifton.	08-Feb-23
624. S	Thee BZG planning committee proposals are detailed and allow for continued access to the area for the community in Bristol. This will provide new, good quality housing in central Bristol which is desperately need. I'm sorry to see the Zoo go but it would be foolish to turn this area into residential space. Particularly because there's no shortage of green space just across the road, i.e. the Clifton Downs!	08-Feb-23
625. O	Bristol Zoo Gardens is a green and educational space and should not be developed for numerous flats and exclude the majority. There are numerous reasons for ensuring it is not developed, including the tourism value set out by BCC itself before the pandemic. The demand has not diminished but increased. Here are just a few reasons for objecting: Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park & Garden and an Important Open Space. Exclusive or restricted access to the site and buildings that are higher and more densely packed than those surrounding just don't work for residents and visitors. BZG brings visitors to the area and that brings vale to the local economy. This is not the time for taking away - we need to build on such great amenities for the long term future	09-Feb-23

626. O	<p>The proposed housing development is totally inappropriate for the area. - It is too high and blocks light and openness. - It is too dense, extensive and flat/block-like, looking more like a fortress - The appearance is not in keeping with the Victorian and other houses in the area. - It causes the loss of mature trees that provide oxygenation, habitat for birds and other fauna - It causes the loss and destruction of world- renowned herbaceous borders that mean the loss of flora and fauna - There is no protection for public access to the whole area, in perpetuity. - The density of the building will require extensive parking on site. There is insufficient street parking already so there is no space for the cars of additional residents. Nobody can reasonably believe that the home buyers will not have cars that need parking. Just because the area has buses doesn't mean they can get to where they need to, by bus. Overall, the scale, density and height of the development is wrong for the area and the impacts beyond just the building have not been considered. If they had, these would not be the outcome.</p>	09-Feb-23
627. O	<p>SAVE Bristol Zoo Gardens Campaign, Campaign Group, Customer objects to the Planning Application Overall Comment The Campaign to Save Bristol Zoo Gardens (SBZG) started with an investigation into how the Zoological Society had made its decision to close the Clifton site and into the business reasons provided. The Campaign found that these reasons which would support their claim that the Zoo was no longer viable on the Clifton site were unfounded. The following points below specify how the application is in breach of planning law and policy. Change of Use not justified The Campaign has enlisted the support of accountants and a former Zoo Director who have confirmed that there is no reason the 186 year old site should not continue in business as a successful visitor attraction. Income, profitability and visitor numbers had all been positive in the decade preceding 2020 and all showed sign of recovery to their pre-Covid levels prior to the Zoo's closure. The picture of the Clifton site as an inevitable failure is false and the decision to sell all their property in Clifton was taken to provide capital funds for their Wild Place Project in Gloucestershire. Both Local Plan policy DM5 and Core Strategy Policy BCS12 make direct reference to the fact that the loss of Community Facilities will not be permitted unless it can be clearly demonstrated that there is no longer a demand for the facility or that the building/s are no longer suitable to accommodate the use and the building cannot be retained or adapted to another community use. Furthermore Policy DM5 goes onto state that the loss of a community facility will only be acceptable if a replacement facility can be provided in 'a suitable alternative location'. The Zoo's own figures indicate that there is still a continuing demand and zoo keepers and zoologists confirm that the site is suitable for certain species of animal. Many alternative community uses have been proposed, ranging from a city farm to an Eden Project style gardens. Sufficient time has not been given to explore these possibilities or their funding. The Wild Place is not a suitable alternative location, requiring car transport, whereas a city zoo is easily accessed by public transport, bicycle or on foot. Ecology and Sustainability The Bristol Tree Forum has already challenged the Zoo's claim of a 38% increase in biodiversity as it is based on outdated methodology. They estimate the outcome to be a 22% net loss. The loss of trees is excessive and experts fear for the remainder when surrounded by building works and then by tall buildings. The proposal to plant '2 for 1' is less than the Council's Tree Replacement Standard. Demolition and rebuilding is not the preferred approach by RIBA due to the loss of embodied energy in demolition and the carbon cost on construction</p>	09-Feb-23

materials. A Bristol environment expert supporting the Campaign estimates the carbon cost of the construction proposed on the site would be equivalent to running the existing buildings for 2500 years. Adaptation or reuse is to be preferred. Public amenity The proposed public access and maintenance of the gardens is to be funded by a levy on the residents. But there is insufficient evidence that this right will be granted in perpetuity as this access is permissive and could be modified or withdrawn. It is the prediction of many objectors to his scheme that the residents will object to funding a public amenity and in time it will become a private space. The scheme provides no long term protection of public access. This could be provided by the dedication of the site for public access in perpetuity under section 16 of the Countryside and Rights of Way Act 2000, which would be binding on subsequent owners. Alternatively, designation as a town or village green. The Zoo could apply for voluntary registration under the Commons Act 2006

Harm to overall historic interest and significance of site The May 2022 Heritage Statement acknowledged the harm that is caused to the site and Conservation Area through the departure of the Zoo from its historic home, a point echoed by Historic England. The SBZG disagrees that this harm is justified by the current proposal. The significance and irreplaceability of the site as a whole is fundamental to this application. Bristol Zoo Gardens is the oldest one in the UK and the fifth oldest in the world. It has been open for 186 years. NPPF 189 states: 'These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'. Loss of Communal Value Defined as 'Value deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.' in English Heritage, Conservation Principles, 2008. At the public level, hundreds of thousands of people have visited the Zoo as children, as adults and with their own children for more than 150 years and the loss of this experience is not to be taken lightly. Additionally, the ashes of many people have been scattered within the herbaceous borders - to be lost under a roadway - while others have held weddings and celebrations in the Pavilion, which will be lost to flats. Harm to listed buildings The original and particular use of many of the buildings is integral to their historic significance and is cited as a key reason in the listing designations of the four animal houses on the site, justifying their listing at Grade II and their national importance. Harm to an asset of this significance should clearly be only as a last resort. The D&A statement refers to 'Historically significant buildings retained and sensitively converted to unique, environmentally sustainable homes'. But the SBZG finds that such conversion would completely change the presentation and significance of these buildings, meaning the loss of: the Clifton Pavilion, Great Aviary/Parrot House, Giraffe House and the Museum/Activity Centre, all to apartments. It is not considered that the applicant has made the case for the level of harm proposed to the listed buildings within the site. Justification of harm It is recognised by the NPPF that new uses are sometimes needed for heritage assets to generate income for their long-term future. In order to do this, it may be necessary to cause some harm, but it is clear that in identifying the 'optimum viable use' for a heritage asset, the optimum viable use is one that causes the least harm to significance. The SBZG argues that the proposed scheme would cause significant and irreversible harm and is not justified. Alternatives Other proposals for the site have been put forward either in broad outline or in detail and this suggests that other schemes are possible. Covid has provided a distraction so that disposal of the site is presented as a finished decision. But this is a nationally



	<p>important site and time could usefully be taken to allow further time for ideas or to run a competition to determine its future. The Campaign's preference is that it reopens as 'a Zoo fit for the 21st century' which was the Zoo's strategy up to 2020. Design Even if there were no alternative to building densely on the site, the proposal is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over-intensive with a consequential poor relationship with the adjacent school and its listed buildings. The north building at six storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular the Bear Pit would be overly dominated by new development. Landscape Bristol Zoo Gardens are a locally listed heritage asset designated as a Local Historic Park/Garden and an Important Open Space. The Avon Gardens Trust has voiced concerns around the loss of trees, the viability of translocating other trees and hedges and the general impact on green infrastructure from ground and environmental disturbance during the long phases of works and the eventual overshadowing from tall buildings. Cars and Parking The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought not least as it creates another visual and psychological barrier for free pedestrian access to the green spaces within the site. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site. SAVE Bristol Zoo Gardens Campaign February 2022</p>	
--	---	--

628. O	<p>In their 2020-2025 Strategy the Bristol, Clifton and West of England Zoological Society made it clear they intended to develop both the Bristol Zoo and Wild Place. That was the right approach. Sadly the Society have reneged on that strategy and for reasons that have been shown to be arguable, have decided to sell the site. Furthermore the Society has not established the case for a change of use. The proposed redevelopment is fundamentally to raise as much money as possible to spend at Wild Place. BZG is a unique asset to Bristol with its glorious mature gardens, a selection of animals birds and insects suitable for being kept in the enclosures they are housed in, a strong focus on education and in a location easily accessible for the population of our city. It is harmonious with the surrounding buildings of Clifton. It has been highly successful in drawing large numbers, and with few exceptions has been profitable year on year. The visitors come to enjoy both the zoo and the gardens. The proposed new gardens will not be of the same interest to the public. The case for maintaining a city zoo alongside Wild Place should have been more fully explored. London Zoo with out-of-town Whipsnade should be the model for Bristol. It should be in the interest of Bristol City Council to do everything it can to enable the Society to keep to their own 2020-2025 strategy. Bristol City planning department should throw out the plans for the Bristol Zoo site to become a housing development with 196 housing units, many of which will be out of character with surrounding Victorian Clifton - a Conservation Area and a heritage site. It will result in fewer mature trees and adversely affect local wild life. Wild Place, although good in its own way, is not re-providing much of what the Bristol Zoo does so well. I am a local resident. and my family - wife, children and grandchildren - have all greatly enjoyed the Bristol Zoo and learnt much from our many visits. I therefore strongly object to the plans - both in principle and much of the detail.</p>	09-Feb-23
629. O	<p>I do not think the proposed development is in keeping with the character of the area. I think the the scale is out of proportion with surrounding buildings and the style of building is not appropriate.</p>	10-Feb-23
630. S	<p>I support this application. I was saddened by the news that the gardens were to close having been a visitor there for over 65 years. However, times have moved on and the most important work that the zoo carries out in wild life conservation must be supported. There is an opportunity here to build some very exciting modern and sustainable housing that Bristol can be proud of. It is also an opportunity to create a place were anyone can come to enjoy, unlike a pay to use facility. Over the years the zoo has become much more of a garden and recreational place than somewhere to come to learn about animals -the emphasis has shifted now we live in an age of beautifully researched and filmed television. I hope there will be a way to create some kind of covenant to prevent the gardens from becoming a gated community and also that the Zoo will always maintain an interest in the development as a place of education. I am very enthusiastic as long as it can be maintained as promised.</p>	10-Feb-23

631.	O	Having looked at the proposed redevelopment plans for Bristol Zoological Gardens, I strongly object to the height of the block of flats alongside the main entrance. The new building(s) will be out of proportion to the surroundings and will dominate the area in a detrimental way.	11-Feb-23
632.	O	I object to these plans on the grounds of loss of light or privacy for surrounding buildings, and especially of light on the roads and pavements. The number of residences will be detrimental to local highway safety, and increase every local traffic and parking issue. The increase in noise will adversely affect local residents, people using the Downs for recreation, and local wildlife. The claim that locals can use the gardens is questionable (how long for? Who maintains or polices the area?). The building have no regard to local conservation or designs, they're monolithic and add nothing to what is a distinctive local character and period. The boxlike appearance of the development is thoughtless and illfitting.	11-Feb-23
633.	O	I object to proposed buildings in the planning application that are of a greater height than those on the site when it was Bristol Zoo.	11-Feb-23
634.	O	Dear madam, dear sir, suggested design will sadly be in extreme negative contrast to the beautiful, much appreciated trademark architecture of Clifton. While new developments are welcome no or very little consideration seems to have been taken to blend a new functional residential building into the unique architectural signature of Clifton/ Guthrie road. Modern at hire tire has so much more to offer than what is envisaged here. I and my family strongly object to the design as shown in information sent to us, and we object wholeheartedly. Prof Dr Guido Pieleles	12-Feb-23
635.	O	Not only does this planning not explain what exactly will happen to the mature garden and trees that are in the grounds , it is not what was suggested in the original planning of course no affordable housing is planned within this . The plans say demolition of selective buildings this is not clear enough do we have to wait until the developers accidently destroy things before they become accountable.	12-Feb-23

636. O	<p>I strongly object to this application and think that the whole zoo and the total space should be saved for future generations. I think this site would be such a sad loss to the people of Bristol and a huge loss to tourism for Bristol. It would be a loss of communal value and space. It is a green and educational space and should not be developed for numerous flats and exclude the majority. I also understand that the business reasons provided by the zoo as to why the zoo was no longer viable on the Clifton site were unfounded and the application is in breach of planning law and policy. Bristol Zoo Gardens is the oldest one in the UK and the fifth oldest in the world. It has been open for 186 years. NPPF 189 states: 'These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'. The need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear, and alternatives have not been explored. This planning application does not explain what exactly will happen to the mature garden and trees that are in the grounds, however, I understand that the loss of trees will be excessive, and experts fear for the remainder when surrounded by building works and then by tall buildings. The proposal to plant '2 for 1' is less than the Council's Tree Replacement Standard. The plans says demolition of selective buildings - this is not clear enough. Do we have to wait until the developers accidentally destroy things before they become accountable? The new building(s) will be out of proportion and not in-keeping to the surroundings and will dominate the area in a detrimental way. The buildings have no regard to local conservation or designs, they're monolithic and add nothing to what is a distinctive local character and period. The boxlike appearance of the development is thoughtless and ill-fitting There will be loss of light or privacy for surrounding buildings, and especially of light on the roads and pavements. The number of residences will be detrimental to local highway safety, and increase every local traffic and parking issue. The increase in noise will adversely affect local residents, people using the Downs for recreation, and local wildlife. The claim that locals can use the gardens is questionable (how long for? Who maintains or polices the area?). I understand that the scheme provides no long-term protection of public access. The proposed public access and maintenance of the gardens is to be funded by a levy on the residents. But there is insufficient evidence that this right will be granted in perpetuity as this access is permissive and could be modified or withdrawn. What if the residents will object to funding a public amenity and in time it will become a private space? This is a nationally important site and time could usefully be taken to allow further time for ideas or to run a competition to determine its future. Bristol Zoo Gardens are a locally listed heritage asset designated as a Local Historic Park/Garden and an Important Open Space. Bristol Zoo should be saved.</p>	13-Feb-23
637. O	<p>I am shocked to see the nature of the proposed development at the zoo site. The design is unsympathetic and overbearing and totally unsuitable for a conservation area. A conservation area is designed to preserve or enhance the area's character this large scale development will do the opposite. The only aim here is to maximise the monetary value upon the site. The design will overwhelm the gardens, obliterate street views and dominate the surrounding area. It appears the zoo's plans are very different to what was promised.</p>	13-Feb-23
638. O	<p>Shame to lose such a great space to yet more housing</p>	13-Feb-23
639. O	<p>Way too many flats!</p>	14-Feb-23

640.	O	I would like to strongly object to the application concerning Bristol Zoo Gardens and the erection of 196 residential units. Whilst it is essential to build new homes, consideration must be given to the existing character of the area. There is the opportunity here to open out the former zoological gardens in a way that would both enhance the area and give benefit to Bristolians. The proposed scheme closes off the area with quite forbidding block of housing, shutting out some light and completely changing the nature of the surrounding area. Furthermore, the existing trees, many planned to be felled, are an essential part of the character of the area. Furthermore, the proposed housing makes no acknowledgement of the existing Victorian and Edwardian buildings and would make a huge impact on the architectural character of the area and far from preserving it, would unalterably change it. It would appear that 'special attention' by the current architects has not properly been directed at 'preserving or enhancing' the area.	14-Feb-23
641.	O	Whilst I am not generally against the redevelopment of the Zoo Gardens the proposed buildings will be a Blot on the local area. It looks more like a prison block than a prime residential development. There nowhere near enough parking for the number of properties proposed and the local streets are already clogged up with cars, some so much so that Emergency Services struggle to get through! The whole scheme needs to be scrapped and returned to the drawing board.	14-Feb-23
642.	O	The site of the old Zoo Gardens is historic and a legacy should, in my opinion, be left so the whole of the Bristol community can continue to enjoy the plant collection and gardens in their entirety, as well as reminding us of its past. There are too many housing units for this size plot and the building plans do not appear aesthetically pleasing or in keeping to the legacy we were led to believe would be incorporated, they look like concrete blocks with little consideration for the surrounding environment. What happened to the idea of conservation, I feel we have been led to think this was going to be with the legacy in mind not some developer making money.	14-Feb-23
643.	O	I object strongly to this application. Surely we can do better than this dreadful proposal. Let's have a rethink about it and try to show a little bit more imagination. Thank you.	14-Feb-23
644.	O	The beauty and character of Clifton and The Downs is a treasured part of Bristol's heritage. Clifton is rightly a conservation area which has largely and wisely been protected from insensitive development. This application would be comical if its aim was to show how ignorance of scale and insensitivity to surroundings could create a "monstrous carbuncle" in the heart of Clifton. That is a serious proposal is alarming! It is worthy of a post war Moscow suburb at its worst. It adds nothing to the character of the area but potentially blights it. I object in the strongest terms possible.	14-Feb-23
645.	O	This type of construction is a monstrosity. It is not in line with a historical site or inline with the local area. I strongly object to this Mediterranean style housing and the concrete jungle with as many people as possible. It is way too high and the whole plan needs to be re-looked at.	15-Feb-23

646.	O	I am objecting to the subject planning application which lies in a conservation area and includes listed buildings. The overall design is out of scale with the adjacent buildings and is overbearing in nature. There will be a loss of public amenity space and many significant trees will be lost (and others potentially damaged). The business case demonstrating the existing use is not viable is unconvincing and so the need for change of use is not made. Overall, neither the principle of change nor design details are acceptable and should be refused.	15-Feb-23
647.	O	Not in keeping with the area Looks like a prison block Six stories too high 196 homes is far too many It's likely a high number of car ownership thus creating problems with parking, causing traffic delays at peak times Invasion of privacy for surrounding properties and gardens, including Clifton College School sites	15-Feb-23
648.	S	I strongly support this proposal which provides much needed housing. The design is well thought out by a top class architect. It is sensitively designed and fits in well. The current owner is leaving the main features of the Gardens for more public to view. Previously you needed to pay to enter the Zoo to see them. Bristol Zoo gardens have closed. The move to the Wild Place will benefit more people and provide a more natural environment for the animals. The disposal of this site will benefit world wide animal conservation.	15-Feb-23
649.	O		16-Feb-23

650. O	<p>Morning Matthew, I hope you are well. We understand from Sinead McKendry of Savills that they have issued a clarification additional to our Objection dated January 2023, grateful if you could note our clients position in this light: 1) In our objection dated January 2023, we note that "A Visually Verified Montage (VVM) view has been provided from across the College playing fields (The Close), from the base of the Cricket Pavilion. However, this only demonstrates the outline of the proposed South Buildings along Guthrie Road with a height of 3 to 4 storeys and not the larger scale development that sits at a higher level, namely the proposed perimeter apartments that make up the North Buildings with a maximum height of 6 storeys or the East Buildings which range in height from 3 to 5 storeys." Our concern with the VVM is not simply the location it is taken from but rather what it does/does not show in terms of detail, notably we do not think it shows the full impact of the taller buildings on the BZG site on the College's Main Campus. As such our objection still stands. 2) In regard to Location we state the following in our objection dated January 2023, "Additionally, the proposed view included within the VVM is neither taken from the protected Local View (LC24) which runs from the south-west corner of the College's Grounds or the identified Long View (L25) as identified in the Clifton and Hotwells Conservation Area Character Appraisal (CACA) Important views and Landmark Buildings Map. Long views are long distance views across the City to key features or landmark buildings. In this instance Long View L25 stretches from the grounds of Clifton College northwards across the College and BZG site, both of which are identified within the CACA as Landmarks of City-wide importance. As a consequence of this the College consider the VVM does not accurately reflect those protected views, as identified in the CACA, and request an updated VVM which accurately reflects the impact of the proposals at the BZG site on Local View LC24 and Long View L25." The College did last year request that a VVM be taken from the School Grounds, however, this should not have discounted VVM's from the two identified CACA protected views, but rather added to these to ensure that a robust approach is taken to all views across the Conservation Area. Whilst the College's priority is to ensure that the College itself is duly considered in the Planning Process, as reflected in the attached email correspondence, this does not change the Policy position on protected views which are clear on where these are located and it is felt should have also been drawn from to provide comprehensive coverage across the entirety of Colleges main campus (in line with the CACA identified views). As such we consider our concerns to still be relevant and recommend that Historic England are asked to confirm that they are content with no VVMs of these protected views, in their assessment of the overall proposals. Additional to the above I would appreciate if you could confirm that the planning application is still on track for a decision on 15th March 2023 at Planning Committee or if the date has been pushed back in light of the additional commentary received. Kind regards, Beth Elisabeth Pywell MRTPI Senior Planner CBRE   Planning and Development</p>	16-Feb-23
651. O		16-Feb-23

652. O	i saw that the Zoo was originally paid for by subscription by the citizens of Bristol .. It is an amenity for the people of Bristol and should not be sold off and moved outside the city, It is easily accessible by bus. It's the fifth oldest zoo in the world. Foreign investors and developers often hiding behind British Companies are NOT interested in our historical buildings,, the cost of the proposed housing to be built is over sized and very expensive and will not be built for Bristol people. The reasons for closing the Zoo are not valid and there has been no real clear evidence that the zoo closure was necessary. The council should NOT allow this development to take place.It will ruin that area of Clifton. Yje people of Bristol love the zoo as it is..	16-Feb-23
653. O	I want to lodge a strong objection to this prposed development on the grounds that, as pictured, the design is completely out of character with the neighbouring buildings and significantly impairs the aesthetic of this beautiful part of Clifton. Why have the planners produced a design that is nothing like the neighbouring area? Whenever any of the residents want to do any kind of alteration to their Clifton property - even felling a tree or putting in a driveway, we are subject to stringent planning regulations. It seems that different rules are being applied to this enormous housing development and that one set of planning standards apply to them, another to the local residents. This is unacceptable. I am not objecting to the building of new homes. I recognise that this is necessary and beneficial. But these should be radically redesigned to be in materials, and in a design, that is compatible with the historical architecture in the surrounding conservation area.	17-Feb-23
654. O	I am deeply concerned at the scale and style of the building proposals in relation to the local environment and the conservation area.	17-Feb-23



655. O	<p>As a resident of Northcote Road, I wrote in July 2022 and then again in November 2022 to outline some of my objections to Bristol Zoo's proposals for building large residential buildings on the main Zoo site. Since then our Northcote Road Residents' Association has received the final report from the professional organisation which we commissioned to carry out a light survey - outlining the light issues which would affect all eight of the houses in our road - caused by the planned building of the blocks of flats in such a very close proximity to our houses. You are most likely aware that the Zoo planners do accept that the houses in Northcote Road would be the most seriously affected by the new buildings so I hope that you will be making special note of the objections brought forward by Northcote Road residents. It is clear that the enormous height and form of the proposed buildings will have a more overbearing impact than I had anticipated. Despite some assurances given to us during several Zoom meetings with the planners, no significant adjustments have been made from the original plans - our suggestions have been disregarded. It is now clear that the proposed buildings will totally change the environment of all the dwellings here. Top floors will lose their views completely. The main living room in my flat, which I have long claimed to have one of the best views in Bristol, will lose this view completely as well as a significant amount of sunlight during the day. Flats and floors lower down within all six houses in Northcote Road will lose much more daylight of course. All of us living in this road are likely to experience a feeling of being enclosed by these buildings. I am not objecting to the principle of new housing being built on the main Zoo site (though I am very much more in sympathy with the "Save Bristol Zoo Gardens" campaign) - it is principally the height of the buildings proposed all round the perimeter which I object to. I should add that the actual loss of light and views to our homes has only become clear when I looked at the new visualisations that the Northcote Road Residents Association have commissioned. The Zoo's published images for what Northcote Road would look like are seriously misleading. In general, it is clear that more and more people living in Clifton, as they find out about the Zoo's plans, are realising that that the proposed flats would be totally unsympathetic and out of character with being placed in a Conservation Area. I urge you to reject these plans.</p>	18-Feb-23
--------	---	-----------

656. O	<p>I wrote on July 4th 2022 to object strongly to Bristol Zoo's proposals for building large residential buildings on the main Zoo site. I write as a resident of Northcote Road, immediately adjacent to some of the enormous blocks of flats being proposed. Since my last letter, revised proposals have been submitted by the Zoo. My original criticisms remain but I would like to make some additional comments. The Zoo has made the most minor and cosmetic of adjustments to their plans and these revised plans just do not address (at all) the concerns raised by myself and my neighbours. The plans for high density and totally inappropriately tall blocks of flats remain and the proposed development is quite clearly totally inappropriate for this conservation area. The visualisations commissioned by one of my neighbours show clearly the completely overwhelming impact the buildings will have. It is no exaggeration to say that they will have a devastating impact on the totality of the local environment - and not just where I live in Northcote Road. The massive block housing developments proposed - very close to the adjacent roads (some of which are very narrow) - are totally out of character with the environment of this part of Clifton. A few particular points arising out of comments made recently on the planning website (Summary of Design Changes and Revised Documents): - The planners have stated that the buildings opposite Clifton College are "in keeping with the local character". Having lived and worked within the buildings of Clifton College for 34 years, I assert that this statement is very wide of the mark. - I dispute the statement that "a traffic analysis demonstrates that the proposed development would generate less traffic than the average daily traffic associated with Bristol Zoo and would cause a reduction in local on-street parking". I have observed local traffic and parking in the area (Northcote, Guthrie and College Roads) for over 40 years (at all times of day) and, knowing the number of units of accommodation proposed and about the limited amount of parking which will be provided on site, I cannot accept this statement. - It is also stated that the noise during the construction phase is not being considered as part of the Noise Impact Assessment. I would suggest that it is vital that consideration of the noise impact during construction should be included as this will be of huge importance to local residents over a period of, I estimate, 5 years of clearing the site and construction of new buildings. The noise and general impact of such a large construction site - in very close proximity to many living spaces - is likely to be enormous and, I predict, is very likely to have a seriously adverse effect on the mental wellbeing of local residents, myself included. Finally, I would like to express great concern about the future of the Zoo's Education Centre (next to the Clifton College Music School). This was a new build just a few years ago and, as I have seen myself, it is a "state of the art" building able to be used for all kinds of educational purposes. As I walk past it each day, I can see that it is, thankfully, still being used. However, the proposed building plans have one of the large residential blocks in the place where the education centre now sits. This obviously means that the Education Centre will be demolished. This is nothing short of criminal - to destroy such a new and useful facility; a terrible waste of resources. I know that the Zoo plans to build a new Education facility at The Wild Place but this will cost a great deal of money and, being much further from the centre of Bristol, make it more difficult and costly for students to reach. This - and the elimination of the wonderful herbaceous border - are just two examples of the needless destruction that will take place if the Zoo's plans are allowed to go ahead. I urge you to reject these plans</p>	18-Feb-23
657. O		18-Feb-23

658. O	<p>I object to this application 22/02889/LA and the associated application 22/02737/F. These two applications are a scheme for redevelopment of Bristol Zoo Gardens from a site of public, natural and cultural heritage to private, residential housing and they should be considered together. I have read the report provided by Save Bristol Zoo Gardens (Report) as well as applicant's main planning documents. This is not a comprehensive list of reasons but several which are important to me. 1. The Zoo provided misleading reasons for its closure. According to the planning statement, the Zoo suffered a decline in visitor numbers from 1m to about 500,000 a year which caused the Zoo to make a loss. The reason for this loss is blamed on the small site, inability to meet the animals' needs, and inadequate parking. The Report shows that the Zoo's attendance numbers are better than comparable zoos, not that far off London Zoo, and that the Zoo has made profits in recent years including with Government support during Covid. The Report states that the majority of the Zoo's animals will be sold or given away. The public is being led to think that the majority of the animals will be kept and given larger enclosures at the new site, when this is not the case. It may be a better match for the Zoo's conservation aims but ultimately feels like they are deliberately fudging things. Like many friends and family, who have grown up with the Zoo, we were initially behind the Zoo's closure as we believed the reasons given. But it looks like we were not properly informed. 2. The Zoo is a very special site for Bristol. Housebuilding should not be something to be pursued at the expense of destroying the special character of our City. Decent housing should be a right for all. Many Bristolians are unhoused, or live in housing which makes them cold and sick. Yet Bristol Post reported in 2021 that there are over 1,000 empty homes in the city. Why should the Zoo be developed into houses? The site has been a well-loved public place for 180 years. The fact that it charges an entry fee is not relevant. Anyone who has ever been there will remember visitors of all description: class, race, gender, age, locals using the playground, tourists gawping, a couple on a date, a family's special day out, schoolchildren, even visiting scientists. If housing trumps everything (which is what the current Mayor has said), then we should be building on the Downs, or tearing down the Suspension Bridge in favour of a newer, wider bridge. We don't do that because these places are special and part of the character of our City. The Zoo is part of Bristol's cultural heritage. Developing the Zoo into housing is no way "respecting the character and heritage of the site". It will mean Bristol and its citizens lose one of the defining features of our City. The Zoo and 196 households will be richer, but the rest of us will be poorer for it. 3. The Zoo shouldn't be allowed to act like a private developer in relation to what has become over 186 years, a public asset. Query whether the Zoo, as a charity, has powers to make this application if it is against the broader public interest. Bristol Zoological Society is a charity dedicated to conservation and education. It runs Bristol Zoo as well as the Wild Place Zoo in South Gloucestershire. As a charity it has tax exemptions because of the public benefits of its objectives. But what if this application can be seen as a conflict between the objectives of conservation and public benefit? This means while it may be lawful under its constitution to take the best action for conservation and education, this comes at the expense of the value and importance of the Zoo site to the City and its people. Does the Zoo not have a duty of care to the public? In "A Pattern Language" (1977) by Christopher Alexander and others, it states "When you build a thing you cannot merely build that thing in isolation, but must repair the world around it, and within it, so that the larger world at that one place becomes more coherent, and more whole." In 2023, more and more people</p>	18-Feb-23
--------	---	-----------

	<p>accept that keeping wild animals captive makes them suffer. What if a zoo for the future doesn't do that anymore, while maintaining the public interest for some kind of zoo at this site. Could development at this site be used to repair the damage caused by zoos of the past and create a positive way forward, encouraging greater empathy with animals and natural habitats both familiar and alien to us, to benefit the Zoo's animals and the wider public of Bristol? If the Zoo doesn't want to pursue this, could they be encouraged to sell to a publicly minded entity that will? In summary, this site has special significance to Bristol and its people and it should not be turned into housing of any kind.</p>	
659. O	<p>As described in many other objections the scale and nature of the proposed buildings are totally contrary to the conservation objectives of both the immediate and surrounding areas. The proposed tall buildings are not compatible to the open nature of the existing site or adjacent Clifton downs. The profile is more akin to a concrete Eastern European development and certainly contrary to the natural and open space which to date has governed the planning constraint on all changes, including private dwellings, in the area</p>	18-Feb-23
660. O	<p>Bristol Zoo is a historic park of cultural significance and is not just a brownfield site ripe for redevelopment. It is a major tourist attraction and could continue to be so even without all the animals because it is so beautiful and fondly thought of by millions of people. The proposed loss of a large number of mature trees which are of botanical and ecological significance is particularly sad especially at a time of climate emergency. There is also a loss of listed buildings and an over- large development in a conservation area.</p>	18-Feb-23

661. O	<p>I wish the planning permission to be refused on a number of grounds: - the site is a tremendous green space that has been accessible to generations of the people of Bristol to enjoy but also a pull for visitors to our city from far and wide. We would, therefore, be shooting ourselves in the foot to squander this valuable communal resource on several levels. - whatever is said now there is a high degree of certainty that significant numbers of the mature trees and parts of the gardens will be ruined and access to whatever is left of what remains will be limited. - the number of listed buildings and gates on site will undoubtedly be harmed also - what right have we to watch &amp; accept the destruction of our heritage. - the proposed design does not offer complimentary buildings to those already standing in the nearby area. - purely from the business case perspective, the need for change of use has not been proven and there are numerous alternatives being put forward that should be explored before the proposed sabotage of this asset is sanctioned. Please let's stop and think before such a destructive plan of action is given the go ahead for the benefit of a few rather than the many.</p>	19-Feb-23
662. O	<p>I am writing once again to respond to the latest reply from the Zoo to the Northcote Road Residents Association's submission on light impacts to our properties. This time, the zoo has produced a set of visual images that completely disguise the impact on the streetscape of this over-bearing and disproportionate development. The inclusion of mature trees disguising the over-looking balconies, height and proximity is disingenuous, to say the least. There is nothing in the report that reassures us that our neighbourhood and quality of life will not be materially affected by this enormously out-of-keeping development, which seriously detracts from the character and heritage of the area. The scaling back of the development by a storey or increasing the set back from the edge of the already narrow and congested road would restore some space and light in a real way - and would be more helpful and honest than a pasted tree on an architect's picture. We would also like to endorse, again, the significant objections that the College has made with respect to failure to consider traffic impact on the surrounding roads, having conducted analysis when the school was not in operation. I trust the analysis will be done when the full congestion and pupil movements can be seen in full, because the danger and safeguarding impacts of construction and ongoing residential traffic on top of the current levels will be unsustainable in the proximate roads. Once the character of Clifton is lost, it can never be restored and this development, if allowed to proceed in its current form will be a shameful legacy for the zoo and the Council that approves it. Our fundamental opposition to this scheme remains and we ask that you reject it without serious modifications to its scale and sensitivity.</p>	19-Feb-23

663. O	<p>Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space. Submitting your comments I wish the planning permission to be refused on a number of grounds: - the site is a tremendous green space that has been accessible to generations of the people of Bristol to enjoy but also a pull for visitors to our city from far and wide. We would, therefore, be squandering this valuable communal resource on several levels. - whatever is said now there is a high degree of certainty that significant numbers of the mature trees and parts of the gardens will be ruined and access to whatever is left of what remains will be limited. - the number of listed buildings and gates on site will undoubtedly be harmed also -what right have we to watch &amp; accept the destruction of our heritage. - the proposed design does not offer buildings complementary to those already standing in the nearby area. - purely from the business case perspective, the need for change of use has not been proven and there are numerous alternatives being put forward that should be explored before the proposed sabotage of this asset is sanctioned.</p>	19-Feb-23
664. O	<p>The development does not either preserve or enhance the character of our area. The development is unsightly and resembles a barrier, and is not at all in keeping with other properties in the vicinity.</p>	19-Feb-23
665.	<p>Please see below the continued personal objection from 6 Northcote Rd for this current application. We would request this be considered in conjunction with the earlier objection from Humphreys &amp; Co for the Northcote Road Residents' Association of 6<sup>th</sup> February which you published on your portal on 8<sup>th</sup> February.</p> <p>Our Personal Outlook at 6 Northcote Rd  They say a picture is worth a thousand words. We are happy to have published these pictures below which show the direct damage that would be inflicted on our own outlook at 6 Northcote Rd if this proposed development were to be approved in its current form. Living in a maisonette, this shows the before and after impacts on our first floor – our main living and working space – and our main bedroom on the second floor.</p>	19-Feb-23



Although the Zoo and architectural team have visited us and are aware of this, we are deeply distressed that no significant, subsequent effort to address this blatantly and hugely adverse outcome for all the residents of 6 Northcote Rd has been attempted. Indeed, to add huge insult and considerable hurt to injury, the individual architect responsible for the design of the scheme actually stated publicly “you’ll just have to close your curtains”.

We know we have no right of view. However, our panoramic outlook of trees sky and historic buildings stretching over 1000 metres would be reduced to barely over 20 metres ie. by 98%. Mostly, we would be left looking directly at a brick wall plus a few windows with no sky visible from within the spaces within our rooms.

The images shown here also suggest there might well be some issues of overlooking from windows opposite that are higher than our living spaces that have not been fully understood or adequately addressed. It has also been suggested that we won’t be affected by overlooking from the top floor terrace as it is to be a maintenance access only balcony. However, even if this were so, there is also a private terrace just over 23metres away (top right picture – top left corner) which given its proximity and greater elevation clearly looks down into our key living spaces. This proximity and minimal level of separation at such elevations is completely out of character with the area in which we live.

Unsurprisingly, the net impact of this proposed development is to make us feel trapped and imprisoned in a brick walled cell and yet, simultaneously, we also feel vulnerable in our key spaces to breaches of privacy and overlooking.

Unfortunately, the height and extent of our windows and the low sills (see photos) also massively amplify the visual impacts of this development on all our key living spaces. There is nowhere in our key living spaces to escape its overwhelming, intrusive and dominant presence. While we are fortunate that at our elevation our very large windows will help maintain higher levels of daylight than lower floor

residences, the significant losses of sunlight on sunny days (estimated almost 50% reduction on March 21<sup>st</sup>) will be very noticeable and also greatly diminish our wellbeing, especially in retirement. Mostly, we will not see the sky anymore from within our living space, let alone enjoy the spectacular sunsets. This is absence of visible sky is a huge and devastating loss.

Surely this is a major, easily preventable and self-evident loss of residential amenity: as it is so clearly intrusive, completely overbearing and dominant and very damaging to our wellbeing. How can this be justifiable when it is clear to us that the reduction of this development by either just two units or two storeys directly opposite would help to significantly minimise this damage without intrinsically damaging the capability or principle of residential development - if that is what is to be decided? These adjustments would also benefit other residents and help begin to address other grave concerns and objections about the scheme.

#### Other Key Objections

We do not wish to simply restate all the arguments elsewhere previously expressed in detail by the letter by Humphrey's & Co on behalf of the Northcote Rd Residents' Association but would briefly make the following points which we believe should be read in conjunction:

#### Unsympathetic and Inappropriate Design plus Insufficient Public benefit

It has been clear from the very beginning that this scheme was never designed with any serious consideration of the neighbourhood and conservation area in which it fits. The oft publicly stated aim by the Zoo team was to maximise the value of the site for the charity within whatever was allowable under planning law. Understandable though this approach may be, the result is a proposed residential development that is simply unsuited for such a sensitive location and the conservation area in which it is located. As has been made clear elsewhere in our previously submitted legal letter, the development fails to deliver significant public benefit, it doesn't fit within the adopted Local Plan and it is not required to deliver the Core Strategy. By virtue of its scale and inappropriate design and height it does more damage to the proposed public amenity of the gardens and harm to the neighbouring conservation area than looks to be justifiable by overstated public benefits. This can be seen by the level, nature and sources of the hundreds of objections, including from the Council's own Conservation Advisory Panel. Even Historic England's support is highly qualified about the principle of residential development and the quantum. On the limited evidence they were provided with, it appears to have focused its attention more on the design of a few parts of the scheme in relation to specified historic assets than assessing its holistic impact on the surrounding conservation area. We have not found anyone who actually lives in the neighbourhood or Bristol who finds the design "sympathetic" as is required under the NPPF.

#### Proposed Quantum

In terms of quantum the Zoo argues that the built development and hardstanding footprint has been reduced from 22% of the site to 21% of the site from 23,200sq metres to 21,900 sq metres. This is only a simple two dimensional representation of the impact. At an average of 4 storeys there will be closer to 100,000 sq metres of hardstanding developed space. As most of the existing structures are only one or two storeys (and often only netting) the quantum mass increase is probably closer to 400% with the average heights now moving up to 4 storeys. It is this considerable increase in average height, mass and quantum that would have a very damaging and overbearing impact within the gardens and beyond. This could



easily be reduced by some more selective reductions in height and articulation. The fact that the Zoo says it must have 156 units development to the gardens (despite the resultant damage to the site and the conservation area) to fund the preservation of other assets suggests a flawed funding model and circular argument. This needs challenging or re-assessing and alternatives considered before being accepted at face value.

Core Strategy Policy BCS9: Loss of Green Infrastructure

We struggle to see how the self evident damage to a very mature ecosystem for a protected Open Space and Historic Gardens sits comfortably with Core Strategy Policy BCS9 which states *“Loss of green infrastructure will only be acceptable where it is allowed for as part of of an adopted Development Plan Document or is necessary, on balance, to achieve the policy aims of the Core Strategy.”* Despite various and contested mitigations proposed to eventually remedy the damage, it is inevitable there will be significant loss and damage that will be done to the green infrastructure for many years to come. Especially in light of the previous arguments above, how can it be reasonably argued that the development of this site would not constitute a loss to green infrastructure that is avoidable?

Conclusions

It has been obvious that the very nature of the site and its setting has created significant and unforeseen challenges for high levels of residential development. Obviously, permission for exclusive residential housing set amongst mature trees with a lake was always going to make the most money if it were allowed. Against this, other offers couldn't compete financially while the zoo took its “must maximise value” approach. However, if this application were rejected then it would surely be possible that less valuable and more sympathetic developments and alternative arrangements could be explored which the Zoo has not previously felt relevant and has not previously shown any interest in exploring. This is such a sensitive site with so much history and meaning to so many people as has been evidenced by the scale and nature of the objections. In this light this application should be rejected for this proposed residential development and proper time and consideration should be given for a rethink. The high levels of objections and their nature suggests the previous consultative process employed has not proven to be sufficiently *“proactive and effective with the community”* (NPPF). However, with the right attitude and a more open-minded and genuinely consultative approach it seems inconceivable that this site cannot raise a significant amount of money (tens of millions of pounds) for the Zoo and leave an asset and legacy that the Zoo, the Council and Bristol can be proud of.

666. O	<p>Dear Development Management Team Re: Bristol Zoo Gardens - Application 22/0737/F - Objection to Bristol Zoo Planning As a deeply concerned resident of 6 Northcote Rd and unofficial "Chair of the Northcote Rd Residents Association" I object to the above application on several grounds. I am not an expert but have tried to read and understand the 200 documents provided as best I can and their implications. If I have unwittingly misinterpreted anything I hope allowance will be made for this. I also hope there will be plenty more time to get independent expert advice and for more genuine dialogue and consideration to be given before any decisions are made. Key General Objections and Comments: 1. The sheer scale, length, height and form of the proposed perimeter residential blocks as it currently stands will significantly damage rather than preserve or enhance the character of this beautiful, historic Clifton Conservation Area in general, beyond the Zoo Gardens. It will dominate and intrude into the local neighbourhood in the adjacent streets. It will significantly reduce the sense of spaciousness and residential and visual amenity that is currently a feature of this area. It will significantly deprive people of the views of sky, sunlight and the glimpses of mature trees as they live work and play (the children in Clifton College) in the neighbourhood. 2. These same characteristics of scale, height and proximity have resulted in numerous breaches of BRE planning guidelines for reductions in daylight and sunlight within the proposal adversely affecting many of the directly neighbouring properties, residents and children. This is already causing many people significant stress and worry about a real deterioration in their living and home working environments. The scale and impact of the losses of daylight and sunlight for most of the neighbourhood adjacent to the Zoo has been significantly under-represented. The report provided by the Zoo's daylight and sunlight surveyors appears to include many significant errors and numerous omissions in the presentation of its data. However, if this scheme were approved, based on the data presented and contained within the reports it appears there will be significantly darker and gloomier winters for much of the neighbourhood and almost all of the adjacent residents. This is contrary to impressions implied by the surveyors' written conclusions. In an environment when we are increasingly understanding the importance of mental health and wellbeing for adults and children and we are aware of the vital importance of daylight and sunlight, surely we should not be choosing to breach BRE guidance in such an important aspect merely to aid additional profit for the few. 3. The scheme does not appear to be as environmentally positive as implied which is extremely disappointing for a proposal from the Zoo. 4. The suggestion that a few access entrances will make the gardens a wonderful unique community asset that many people beyond the neighbours will visit, seems overplayed in an area where the magnificent Clifton Downs are adjacent. 5. Although the scheme clearly satisfies the planning requirements for social housing there would seem to be very little social benefit that a 20% price reduction on price and 30% reduction on rents in c.40 Clifton properties (built over several years) which command almost twice the price of other properties in many other parts of the city. Thus, this development should not be considered as a major social benefit nor a reason to build an unnecessary large numbers of homes to maximise the profits for the Zoo if it is to the immediate and permanent detriment of the local community and the historic character of the conservation area. This is especially true when there are so many more and better located brownfield sites elsewhere that can build higher quantities of more affordable housing. 6. Even if permission were given for a reduced scale of lower level housing to a more environmentally suitable scale</p>	20-Feb-23
--------	--	-----------

(perhaps 50%) one questions whether this really is the best use of such an absolutely unique heritage 12 acres site. No matter how nicely it is dressed up, the greater likelihood is that this proposed development will simply become a pleasant, affluent housing estate with some nice gardens and a nod to social housing. It will not really do anything to help the less well off and most needy, nor will it contribute anything substantial to the housing shortage. It will perhaps provide c.60 new homes per year, (12 "affordable") with the first phase completed in 3-4 years' time. Neither will it provide much of significant benefit to remaining non-Clifton Bristol residents. Overall, the development seems much more likely to leave a permanent, unwanted and "visible legacy of darkness" for its neighbours depriving them of far more pleasure and amenity in the short and long term than it will ever return. Without being a planning expert but just by walking around the perimeter it is fairly easy to imagine that many of these problems and most of these objections might be resolved - quite simply, by reducing the existing heights of all the blocks of flats by two storeys around the entire perimeter. Of course, this would limit the potential profit from this particular development and this particular site. However, this profit can only be realised and is only significantly increased by the agreement for change of usage to allow the development of high value housing. This is why we very much hope and are relying on Bristol City Council to make the right long term decision for both Clifton and Bristol. Its role is not to maximise profit for developers. If it does make the right decision then it can help ensure the Zoo and its trustees do leave a legacy they can be proud of rather than a "dark legacy of resentment" to the Clifton Community in which the Zoo has resided for over 150 years. If this current application were approved the latter legacy would seem to be the more likely outcome. The Northcote residents have been very frustrated, disappointed and distressed that the zoo planning team have pursued this planning application with such apparent disregard for the clearly expressed concerns and constructive suggestions made during consultations with their neighbours. The Zoo team have produced a number of impressive professional documents in support of their proposal. However, these appear to provide a rather flattering gloss over the plan's defects and its limitations and impacts. The zoo has repeatedly made it clear to us that the planning application has been submitted with the intention of extracting the maximum potential value for the site, albeit within a significant number of constraints due to the special and unique historic characteristics of this site. This proposed plan demonstrates that intent very clearly. More Specific Detailed Objections and Comments: Breaches in BRE guidance for Daylight and Sunlight: Devla Patman Redler report The Zoo team's Savills surveyor has admitted that these surveys are something of a "dark art" so I thought I would look at these closely upon the advice of a professional planning consultant. It was pointed out that surveyors are unlikely to produce reports for their clients which suggest that the proposed scheme's viability is threatened as a result of breaches in the BRE guidance on light reductions. Disturbingly, there appear to be a significant number of clear errors and even large numbers of omissions in at least some of their tables of source data provided in their appendices. By using N/A in certain rows of their appendices they have omitted to show and include many dozens of windows that that experience adverse effects of greater than 20% reduction for the Vertical Sky Component and 20% reduction in the Annual Probable Sunlight Hours. Each of these 20% reductions in light represents a breach of BRE guidance. I estimate there are many dozens of errors and possibly hundreds of omissions. This has resulted in significantly incorrect percentages being quoted and I have not found the report to

be impartially or fairly representative. All the errors and omissions seem to be in the favour of the development despite the many breaches of the BRE guidance with subsequent widespread negative impacts on much of the neighbourhood. 6 Northcote Rd For example, at 6 Northcote Rd, First Floor where we live, the summary table only shows a reduction in VSC of greater than 20% on 1 window rather than for the 3 windows that the data clearly implies - if the calculations had been completed correctly. These 3 windows represent 100% of our most important living space as they are our prime living and working space 16 hours/day in a post Covid working from home environment. As far as we can envisage, we will actually lose almost all sight of the sky from the room and simply be looking from all parts of the room and beyond at a plain brick wall just 21 metres away. This wall will tower several metres above our windows and the skyline on this floor. This brick wall "feature/view" will intrude into and throughout all the key living spaces in our flat even including the kitchen. The data would also appear to indicate that we may lose more than 20% of our Annual Probable Sunlight from especially in the winter months when sunlight is scarce. However, this data is not highlighted in the report. The impact of such developments on our lives and wellbeing would be massively detrimental, especially as one of us is prone to SAD in winter. We don't really understand the NSL calculations so we can't comment usefully except to say that in light of the data and the presentation of what we have seen so far in this report we are deeply concerned and very distrustful. Elsewhere: Across the report we note numerous VSC errors and omissions: Table 10.2 6 Northcote Rd should indicate that 5 out of 17 windows (29.4%) have more than 20% reductions in VSC (failures) rather than 3 out of 17 failures (18%) as reported. Note this equates to a significant 63.3% error in favour of the proposal. 5 Northcote Rd indicates only 1 window out of 11 has more than 20% reductions in VSC (9%) when the data shows 4 failures (36.3%) 4 Northcote Rd indicates 1 out 11 windows (9%) fail when there are actually 3 failures(27.3%) 3 Northcote Rd indicates 4 out of 14 windows fail (28%) when there are actually 7 failures(50%) 2 Northcote Rd indicates 7 out of 15 windows (47%) when there are actually 8 failures(53%) 1 Northcote Rd indicates 8 out of 15 windows (53%) fail when there are actually 10 failures(71%) Pooles House indicates 17 out of 71 windows (24%) fail when there are actually 23 failures(32%) Everything appears to have been significantly (mis)represented in favour of the development - I have estimated 71 errors and as many of these houses are split into flats the percentage impacts of these losses can be very significant for different households. Annual Probable Sunlight Hours As far as I can see the tables in the appendix are full of N/A's which do not generally show the percentage sunlight reductions nor do they show the calculations for the amount of APSH lost across hundreds of windows Pt. 4.15 states: o Sunlight will be adversely affected if there are 0.8 times former sunlight hours during either period o The reduction in sunlight will over the whole year will be greater than 4% APSH Pt. 10. states: If the overall annual loss is greater than 4% of APSH, the room may appear, colder and less cheerful and pleasant. However, for the data provided for the Northcote Rd residential properties it would appear that over 95% of the windows will get a reduction in APSH greater than 4%. Over 90% of windows will get reductions of over 20% light in the winter months, some from existing low levels of light, especially the lower floor flats. This is a significant adverse impact for very many people which has not been highlighted in the surveyors' report The level of both errors and omissions in this report would appear to significantly undermine the accuracy and validity of the numbers quoted and potentially, the conclusions about the adverse impacts of this development. If the same level of

omissions or errors is true across the whole report, across all the properties it appears to massively underplay the impacts of the loss of daylight and sunlight on the direct neighbouring communities to the Zoo's perimeter. The Townscape and Visual Assessment The proposed development is in a wonderful, unique and historic conservation area where the guidance states that: See Planning (Listed Buildings and Conservation Areas) Act 1990, section 72, paragraph (1) 72General duty as respects conservation areas in exercise of planning functions. (1)In the exercise, with respect to any buildings or other land in a conservation area, of any [F1functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. Much has been done within the inevitable constraints of the site itself within the walls to preserve the main beautiful features as far as possible - given the desire to build hundreds of housing units! Unfortunately, this has resulted in the housing being pushed to the perimeter wall. Here, it is clear that in many cases the net effect is the opposite of preserving or enhancing the conservation area within which the Zoo sits. The biggest problem seems to be the sheer scale, length height and form of the structures in such close proximity to the neighbouring residents and streets. While some of the structures might work in some places as small infills in a district, this entire development is on a very different scale. i) There is almost 600 metres of a continuous modern blocks flats which is entirely out of character with the conservation area. The combination of height, continuity and proximity to the wall especially on the narrower streets such as Northcote Rd will overpower and dominate the neighbourhood like nothing else in Clifton. While the properties are claimed to enhance the sense of a "walled garden", the fact they tower 50 - 60 feet above the wall in many places creates more of a sense of a "walled city or fortress". Some have called it Stalinesque. In general, 2-4metre walls with a one or two storey storey structure previously behind them (not always solid but see through) now have 4 or 5 storey buildings proposed - rising up to 60 feet higher than before. ii) The flat roofs do not complement the pitched roofs of the Clifton roofscape but obscure them in places. In some cases, they also bring the tops of the buildings closer to the street and their neighbours creating a more domineering impact. iii) The height and proximity to the streets and other properties obscures the sky, plus key glimpses of mature trees and the historic buildings such as Clifton College which are so much part of the character of this historic neighbourhood. This is especially true on the South end of Northcote Rd where residents live and work and children study and play and walk to and from classes. It also clearly applies to views from Guthrie Rd. iv) The level of loss of sky and sunlight loss in winter for the hundreds of people who walk along Northcote Rd every day and live or work or play in many of these neighbouring properties will be substantial. It will create even longer darker winters that will surely be to the detriment of the hundreds of people affected, just when we are all at our most vulnerable. It is noticeable that the proposal is very sparse on images at street level. These would give a much better sense of what the potential impact of the proposed development would be. Many pictures are plans, aerial photos or simply, rather flattering sketches. A walk around the perimeter looking up easily shows the difference. Mostly, it is very hard to see how the proposal can be said to be "preserving the character" let alone "enhancing it". Elsewhere in Clifton, where buildings of comparable heights exist they are rarely directly opposite, so close to each other or so close to the pavements or thoroughfares. They are either at least 28 - 35 metres away from each other and set back from the pavements or they

	<p>have many "look throughs". These elements help sustain and create a sense of spaciousness and sky that characterise the neighbourhood. The report summary Pt. 8.9 clearly states that the development will "increase the effect of urban closure," " provide increased visual closure of the local street views" and "substantial adverse effects" for "private residential properties on Northcote Rd." Apart from the improvements of replacing some low quality buildings at the top of Northcote Rd, the only beneficial effects acknowledged in the report appear to be the few glimpsed views into the site through the proposed new access points. At best, these "positive" effects have been acknowledged as slight. The larger number of adverse effects in the report are either judged as moderate or substantial. The photos 37 -47 in the appendix provided in support of this judgment regarding the level of adverse effects experienced really do not give any accurate sense or feeling of the adverse impacts of this development - which are a lot more powerful than implied. The report suggests the adverse impact for Northcote Rd is moderate. Maybe this is partly because it states that this is a "strongly urban environment". However, despite some urban features especially at the North end this categorisation does not seem so true at the South end where the Victorian terraces and residential buildings are. Photo 42 does show that the lower end of Northcote Rd feels more suburban rather than urban as described in the report. This photo also shows that at least 30% of the mature greenery viewed from this location would be obscured by the proposed development - which is obviously an adverse impact. Clifton is a spacious suburb and the high levels of sky and visibility and mature trees visible throughout. These characteristics help it retain this spacious feeling even when more urban features are occasionally present. The increased height of the buildings and greatly increased sense of closure along Northcote Rd especially at the southern end of Northcote Rd will completely destroy this sense of suburban spaciousness. The report does however acknowledge the severe adverse impact and high sensitivity of the scheme for the residents of Northcote Rd at the South end. This makes it all the more surprising and disappointing that the proposal was not adapted in this respect, especially given the constructive suggestions made by the residents during the consultations for some appropriate height reductions and cut throughs. These were ignored, much to our considerable distress and frustration. Environmental Concerns I am not an environmental expert but how likely is it really that several years of building works and demolition, uprooting over 100 mature trees, introducing 200 new homes, 400 new permanent residents plus 100+ cars is actually going to support or enhance the environment? I see the Tree Forum in a public comment has suggested that the Zoo's claim of an improvement in its sustainability is wrong and that there will indeed be a significant deterioration. I do not understand how such a unique 12 acres site, relatively undisturbed/stable for so long with so many mature and unique trees and vegetation habitats can be considered appropriate to redevelop in this way on this scale for so little housing and social benefit Conclusions It is understandable that the trustees of the Zoo and their team of experts may feel they need to put in as strong a plan as possible so that they can maximise the potential profit for the site and so that feel confident that they are not at risk of being sued for not fulfilling their fiduciary duties. However, the scale of this scheme proposed and the apparent disregard of almost all the valid major concerns expressed by the neighbourhood during consultations has been enormously disappointing and distressing. The omission of helpful images at ground level which could have been produced plus the volumes of omissions and errors in data presented need to be rectified and clearly presented and made</p>	
--	---	--

	<p>available for all to see and understand. For a site of this size the detrimental impacts need to be better explained and understood. I believe the Council might consider an independent review or new reports for these items. If this current proposed scheme were approved, I believe the Zoo's legacy would be far from what it desires. While doing very little to address the crisis of affordable housing, the proposal currently risks leaving an embittered darkened neighbourhood permanently diminished in many of its unique and precious qualities, surrounding quite a posh housing estate. The profit from approving the change of usage and this scheme would clearly benefit the zoo and the developers by millions of pounds. However, it would be at the direct expense of Clifton which would suffer years of massive disruption as the site was transformed for such a large project plus longer term enduring negative impacts of something that so clearly fails to preserve and enhance the character of the area in many important respects. Surely, if housing has to be approved, at the very least a much "lower rise" solution is required. This would benefit the internal zoo site residents as well as the entire neighbourhood. Alternatively, could the zoo and the Council give something like the OurWorld proposal a better consideration for a more fitting and suitable legacy for the benefit of the whole of Bristol? If this change of usage and the scale of this residential development were to be allowed by Bristol City Council now, this could be a massive, opportunity lost for this historic unique site, forever. This would appear to be for the sake of a few expensive dwellings benefiting a few hundred mostly quite privileged and affluent people, plus some profit for the property developers and some extra "windfall" millions which are desired but not actually required by the Zoo - which is a charitable trust. All of this would be at the expense of Clifton, its unique and outstandingly beautiful neighbourhood and conservation area and of no significant benefit to the remainder of Bristol. We all understand the reason for the loss of the Zoo which is a very sad loss for the city and the neighbourhood. It has brought much life and vitality and happy memories to so many for over hundred years and will be greatly missed. Surely, we all deserve something more fitting in its memory, than a large, overbearing, "rather posh housing estate".</p>	
--	--	--

667. O	<p>Dear Matthew As you are the Case Officer for the above, I am writing to ask for your advice and help regarding a number of matters concerning the Bristol Zoo Planning Application Ref. 22/02737/F and in particular, I have questions regarding the processes likely to be involved from now. I am a resident of 6 Northcote Rd and Chair of the Northcote Rd Residents Association. You will have seen various objections, concerns and fears expressed from different Northcote Rd residents, who are almost certainly the Zoo's residential neighbours potentially most adversely affected by the proposed development. This was acknowledged in the townscape assessment and to us personally, by the Zoo planning team. Our Primary Concerns Our concerns have been primarily based on the potentially overpowering, overbearing, overshadowing and intrusive impacts of the immediately adjacent proposed blocks of flats planned so high and so close to us all. In our particular part of the neighbourhood at the bottom end of Northcote Rd, the incongruence of the design and its scale and potential adverse impacts on the townscape in an historic conservation area plus the significant losses of daylight and sunlight, really are much larger than the planning application and some of its supporting documents imply. There is nowhere in this part of Clifton where such large-scale block of continuous modern housing development exists directly opposite other housing in such close proximity. We have been particularly concerned by the quality, limitations and implications of two documents supplied in the application: 1. The daylight and sunlight survey: acknowledged privately as a "dark art" by Geraint Jones the Savills surveyor, this was full of inaccuracies, with dozens of omissions and seemed utterly misrepresentative of the effects of the development. Some more but not complete detail about the levels of omissions and inaccuracy is contained in my personal, previously submitted objection. 2. The townscape and visual impact assessment: where the suggestion that this was all an urban rather than suburban landscape (only really true for some parts of the wall) and a few select photos in the appendix gave no impression at all of the impacts of the scale of this development in reality as experienced at ground level. For example, appendix photo 45 seems to imply that two mature trees and a significant amount of sky will not be obscured by the 5 storeys intended block, which they surely will be. Indeed, the overall planning application is very light in demonstrating this real ground and street level visual impact - using just a couple of highly selective sketches. This seems surprising for the most major development in Clifton for decades where surely everyone should be getting a much fuller and proper representation of the proposed outcome. Given the huge negative impact of these current planning designs on what I believe you call the "residential and visual amenities" of the residents of Northcote Rd, we are all very worried that decisions are now going to be made based on what we believe to be either inaccurate, substandard, biased or misrepresentative documents. And, although we know that loss of private views and property price losses are of no relevance to planning decisions, for some of us the potential adverse impacts in the current proposal are genuinely heart breaking. If implemented, they would seriously diminish the quality of our lives and our living. This would be true if we stay or if we leave after having incurred the costs of moving and the devaluations of our properties Our Questions We are exceptionally keen to know that the planning process will allow our concerns and our alternative viewpoints and/or documents to be properly considered. This is especially so given the undoubted potential scale of damage to our mental and financial wellbeing from these current plans. However, we freely admit we do not know how best to ensure this can happen. Are you able to advise us please? We have become increasingly worried partly</p>	20-Feb-23
--------	---	-----------



	<p>because of what everyone feels has been a "sham tick box neighbourhood consultation" process by the Zoo's team and partly because some of the documents commissioned by them seem biased and misrepresentative - perhaps unsurprisingly. In their clear pursuit for maximum profit, the Zoo planning team repeatedly seem to have shown almost complete disregard for the concerns expressed by neighbours on all sides of the Zoo including the West Car Park and Clifton College. If possible, we would like to know the following please: i) What is the process from here on in and where or how do we at Northcote Rd get our concerns properly explored? ii) What happens on the Monday 12th September determination date/what is the process? iii) What is likely to happen or could happen after this date? iv) Is there anything we could do privately in advance that would help/or we could do afterwards? v) Will there be another independent light survey commissioned? vi) Will there be a requirement to model ground level and street views of the development from inside and outside the zoo? Will they be independent? If so, who will pay for them? vii) Would it make sense for the neighbours to commission some of these services and if so, by when would they now be needed? Could we be given access to some of the Zoo's team data/models already built to help do this? viii) Would it be helpful to submit some more illustrative pictures and corrected photographs of the visual impact at ground and street level even if not terribly sophisticated? Would it be helpful to submit these with some constructive suggestions? ix) Would it be possible for you or a representative of the Planning Committee to meet briefly with us and literally see things from our points of view? And if so, when? (A late afternoon as the sun drops is quite illuminating!) In our experience, once people have seen the current heights of the proposed development in relation to the existing trees and buildings on Northcote Rd a short 5 minutes' walk is sufficient to reasonably visualise how (shockingly) overbearing the impact would be. This is all due to the combination of the proposed building heights and their proximity to the street. It is immediately obvious that huge amounts of sky and practically all glimpses of mature trees and of the historic buildings, plus almost all the late afternoon sunshine will be obliterated. It is these characteristics that give this part of the neighbourhood its character and keep it feeling suburban and spacious, despite some low-level urban features being present. Once these features or characteristics are lost, the Northcote Rd area becomes much more urban, more enclosed and quite a lot darker for much of the afternoon and early evening. Some of these elements were slightly acknowledged but in a very understated way in the townscape assessment.. In our personal instance at 6 Northcote Rd, the proposed outlook changes from looking at broad skies and trees stretching almost a mile away to simply looking at a 50ft -60 ft high brick wall just 66 feet away, with barely a glimpse of sky from any window - intruding and dominating all our key living and working spaces. To visualise this potential change is truly shocking and deeply dispiriting. It is a genuinely distressing experience I now have many times each day, every day since the planning application was submitted - after the last consultation we were all shocked by the absence of any fundamental changes. I would really welcome an opportunity for you to visit us so that you can so simply and easily visualise all this. The adverse impact here at this end of Northcote Rd is evidently many times worse and much more instantly visible than that of the West Car Park. Yet, if there were a meaningful conversation with the neighbours we feel these particular concerns might be reasonably addressed with some reductions in heights and scale or increases in distance in the right places. The Northcote Rd residents are not inherently opposed to plans for housing. However, we have</p>	
--	--	--

	<p>become very upset by the Zoo's approach which has come across as feigning interest, feigning sincerity and feigning concern. They have proposed a scheme with almost complete disregard for our clearly expressed key concerns and constructive suggestions and which is directly and very evidently at the significant expense of our own mental and financial wellbeing. The current application clearly seeks to maximise their profit with complete disregard and at huge direct emotional and financial costs to their direct neighbours. (They can only get an extra million pounds because we, collectively, lose a million pounds so to speak!). While we appreciate both the Zoo's needs for money and Bristol's needs for housing it is surely not the responsibility of the Council to maximise the profits for the Zoo, to the clear disadvantage of the existing neighbouring community. The legacy the Zoo's team are proposing to leave Clifton after 186 years does not currently appear to be either an inspiring or a happy one for its erstwhile neighbours. We are now very much hoping and relying on the Planning Committee to help address this matter fairly - obviously, with full regard to planning law and planning guidelines. We understand there are many stakeholders and demands including present housing needs and Zoo trustees to be taken into account. As the Northcote Rd residents who are directly adjacent, we have been acknowledged as the most adversely affected of the residential neighbours. We simply cannot see how the current plans for our neighbourhood can reasonably be argued to preserve and enhance the neighbourhood's character. More detailed examination and understanding of the significant reductions in daylight and sunlight plus the obliteration of almost all views of historic buildings and trees from within the terrace and at street level show the development would significantly damage the neighbourhood's character for us all and massively diminish the quality of very many more lives at our end of the development than it will ever enhance. We would like to be reassured we will be given a proper and fair chance of proper representation regarding our expressed concerns and we would very much like to understand how best we might achieve it. Any advice you can give will be greatly appreciated. Please do forgive the length of this letter. I know things are slow in August but given the pending September 12th determination date I would greatly appreciate your prompt acknowledgment of your receipt of this and welcome your response and advice as soon as possible, please. Many thanks and best regards</p>	
--	---	--

668. O	<p>I strongly object to the proposals insofar as they relate to the southern end of Northcote Road in particular. There have been only minor changes to building E2 and no changes at all to building E3. Contrary to the impression given (for instance Penoyre &amp; Prasad's answer to Q2 raised by Clifton College, as set out in Appendix 5 of the October 22 Planning Statement), building E3 has been set no further back than shown in the October 2021 consultation, nor has it been reduced in height. Building E3 itself dwarfs the other buildings in Northcote Road in scale and height, as is clearly shown in document BZG-PPA-ZZ-ZZ-DR-A-2602-PL1. What is not shown so clearly in that document is its height in relation to numbers 1 and 2 Northcote Road, both substantial Victorian houses. Based on the proposals, building E3 would be over 8 metres taller (measured to the eaves) or 6.5 metres taller (measured to the ridge) than these houses, contributing strongly to the overbearing effect. I have previously raised a concern as to the adverse impact on the front gardens of numbers 1 and 2 Northcote Road from overshadowing, particularly the loss of afternoon and evening sun. I do not believe that this has been addressed. The gap between buildings E2 and E3 is of limited benefit to those neighbours who are positioned further along Northcote Road, particularly towards the southern end, where the unrelenting mass of building E3 will dominate. The daylight and sunlight assessments show adverse impacts to several rooms in residential properties in Northcote Road, beyond BRE guidelines, with rather trite comments such as 'retained daylight levels are considered acceptable' or 'the neighbouring residential properties will generally remain with adequate levels of daylight and sunlight'. To whom they are considered acceptable is unclear, but it is certainly not the owners of the properties concerned. Nor does there appear to be any recognition that it is generally the principal reception rooms (those on the lower floors) that are worst affected, and where the loss of residential amenity will be most felt. To summarise, those residents towards the lower (southern) end of Northcote Road are particularly severely impacted by the proposals, largely because of the extreme height of building E3 and its proximity to neighbouring properties, but also because it is positioned in such a way that it will take away much of the afternoon and evening sun. Without a significant reduction in the scale of this building, I urge the planning committee to reject the proposals.</p>	20-Feb-23
--------	---	-----------

669. O	<p>I wish to reiterate my objections to the proposed development. I am extremely disappointed that, despite our having raised objections on numerous occasions throughout the consultation process, the applicants have made no changes of any significance to the proposed Building E3. This building is, quite simply, far too tall relative to existing neighbouring properties in Northcote Road. This is in a Conservation Area whose character should be preserved if the term is to mean anything at all. As it stands, building E3 would tower over neighbouring properties, dominating the outlook even from upper floors, and casting lower floors and front gardens (which currently enjoy a sunny outlook) into shadow for much of the day. The effect on those of us living in the area in terms of mental health and wellbeing would be devastating. Quite apart from the issue of height, the proposed buildings are not at all sympathetic to their surroundings: the overall design of the site, comprising high blocks placed around the perimeter, has the appearance of the worst sort of gated community, designed to keep people out rather than to contribute to the wider community. If the site is to be developed for housing, then please make it more sympathetic to its surroundings to avoid doing irreparable harm to buildings that have stood there since the Victorian era, as well as their residents. This could be done by reducing the height and massing of buildings and setting them further back from the perimeter.</p>	20-Feb-23
--------	--	-----------

670. O	<p>I strongly object to the proposals insofar as they relate to the southern end of Northcote Road in particular. Contrary to the impression given (for instance Penoyre &amp; Prasad's answer to Q2 raised by Clifton College, as set out in Appendix 5 of the October 22 Planning Statement), building E3 has been set no further back than shown in the October 2021 consultation, nor has it been reduced in height. Building E3 itself dwarfs the other buildings in Northcote Road in scale and height, as is clearly shown in document BZG-PPA-ZZ-ZZ-DR-A-2602-PL1. What is not shown so clearly in that document is its height in relation to numbers 1 and 2 Northcote Road, both substantial Victorian houses. Based on the proposals, building E3 would be over 8 metres taller (measured to the eaves) or 6.5 metres taller (measured to the ridge) than these houses, contributing strongly to the overbearing effect. I have previously raised a concern as to the adverse impact on the front gardens of numbers 1 and 2 Northcote Road from overshadowing, particularly the loss of afternoon and evening sun. I do not believe that this has been adequately addressed. The gap between buildings E2 and E3 is of limited benefit to those neighbours who are positioned further along Northcote Road, particularly towards the southern end, where the unrelenting mass of building E3 will dominate. The daylight and sunlight assessments show adverse impacts to several rooms, beyond BRE guidelines, with the rather trite comments that the 'retained daylight levels are considered acceptable' or 'the neighbouring residential properties will generally remain with adequate levels of daylight and sunlight'. To whom they are considered acceptable is unclear, but it is certainly not the owners of the properties concerned. Nor does there appear to be any recognition that it is generally the principal reception rooms (those on the lower floors) that are worst affected, and where the loss of residential amenity will be most felt. Those residents towards the lower (southern) end of Northcote Road are particularly severely impacted by the proposals, largely because of the extreme height of building E3 and its proximity to neighbouring properties. Without a significant reduction in the scale of this building, I urge the planning committee to reject the proposals.</p>	20-Feb-23
671. R	<p>Hi Jeremy You do not know me, and we have never met. I am Chair of the neighbourhood forum that covers the area: Clifton, Clifton Down, Hotwells and Harbourside I am also founder &amp; Chair of Clifton Neighbours I have an interest in the future of the Bristol Zoo Gardens Site. I understand the planning application may now be considered at the Development Control A Committee on Wednesday 15th March 2023 I would like the opportunity to stand and speak briefly at that meeting to represent the views of the community. Perhaps you could let me know if that is possible. Regards Gerry Swarbrick Clifton Neighbours</p>	20-Feb-23
672. S	<p>I personally think that it is terrible that fellow parents and the College have mounted such a petty organised assault on the zoo's plans. From all of the information that I have been able to find it would appear that the plans put forward are robust and I for one fully support them in their enterprising efforts to build more houses whilst keeping their beautiful gardens open into the future.</p>	20-Feb-23
673. O	<p>The housing is too dense and not in keeping with houses in the area. They are too close to the adjacent roads and too high. The development is not suitable for the general public to be able to use the facilities.</p>	20-Feb-23

674. O	<p>Clifton has a housing style of architecture that its residents and visitors admire. The proposed housing on this site makes no attempt to blend in with our traditional buildings. The "boxy" elevations are, I consider, quite ugly. As they have car parking at ground level they are one floor higher than necessary. The higher buildings on Northcote Road and Guthrie Road will dominate these roads. The proposed public access comments by the developer sounds good but I cannot imagine the residents making these visitors welcome. Will there be any facilities for these visitors? Will there be any visitors wanting to visit with their picnic baskets and barbecues and sit on the lawns? Too many of the existing trees are being removed. I visited a new housing development in Bath a few years ago and there were virtually no parking places included on the site. Residents were expected to use public transport, taxis or car hire. Why are there over 100 car spaces being included in this scheme? Bristol has a real car transport problem. Why allow more cars into the City? Other uses for this site should be considered. They may not be as profitable for the Zoo but may benefit the residents of Bristol more.</p>	20-Feb-23
675. O	<p>Please think about the potential for harm that development of this site will cause - the major objection I would raise relates to the buildings proposed - the sense of scale is overbearing. The monolithic appearance is completely detrimental to an area of such stunning historic architecture, and whilst I am a fan of combining old with new architecture, this is not sympathetic or appropriate - the Zoo site holds significant heritage value for Bristol - the huge loss of Communal Value to the people of this city and further loss of valuable, precious green urban space and public amenity is permanently diminished - the harm to listed buildings, that however sympathetically they are converted, they will no longer be accessed by the public and will have their community purpose lost and their use permanently altered. - has the Zoo's justification for abandoning the site been proven? or are they using the pandemic lull as a for a revamped plan to one single site (that was gifted to them) and opportunistically cashing in? - please don't overlook the fact that it is listed as a local Historic Park &amp; Garden and an Important Open Space - with grave concern that half the trees will go and many more may be damaged. This site is so special, make a decision that enables it to stay that way. Change is inevitable, but it should be better change, for the good of the wider Bristol and regional society it serves - spaces like this are too precious.</p>	20-Feb-23

676. O	<p>With the confirmed departure of the Bristol Zoological Society ('the Society') in Clifton, there is need to consider change of use of the zoo site as it holds such significance both in terms of heritage and its position in a conservation area, adjacent to Clifton College School and a range of significant historical buildings . This is the largest building scheme in Clifton for many decades (perhaps ever), and must be very carefully planned and orchestrated. This application saddens me as it appears the line between need and greed has become blurred. The Society will not be the ones commissioning or managing the build, and all safeguards must be thought through by planning, ahead of any proposal being passed. - loss of light or privacy - the scale of the proposal will overlook Northcote Road properties (in particular) and limit their light, and privacy. At most, any buildings on that perimeter should not stand taller than those existing buildings in Northcote Road - overshadowing - the adjacent Northcote and College Roads are very narrow, with resident parking bays or double lines - roads that the height and overscaled apartment blocks along the perimeter walls would dominate at a scale disproportionate to all adjacent conservation area buildings - highway safety - there is no detail about a street lighting plan, nor how this will impact the locality. The plan denotes seven new entrances, four of which will allow vehicular access, which will impact the surrounding streets which are already crowded with school vehicles at any time of day (mini buses, maintenance vehicles, delivery vehicles and full size coaches) plus parents at drop off and pick up times in numerous cars. - traffic and parking issues - whilst the Society have been making efforts to explain their proposal through production of printed materials distributed through letterboxes in the neighbourhood, the literature is misleading, as it fails to illustrate any cars (bar one parked under an awning), but depicts children playing and families picnic-ing, ambling or in a learning space. The gardens look lovely, but the reality is this is a housing development for 201 homes. Cars will need to access the suggested 120 spaces provided in 'undercroft' or 'covered parking' but this is not denoted in any illustrations, giving a false representation of the planned 'other-worldliness' atmosphere. Guthrie Road and the surrounding streets encompass the 'hub' of the Clifton College school campus. The existing traffic for school drop off and pick up times is already unmanageable, despite efforts by the school to encourage the 'if you care, park elsewhere' mantra and are unable to restrain parking on yellow lines, yellow zigzags, and road corners. The proposal suggests an increase in pedestrians in the area, who will be in jeopardy with the subsequent congestion generated by a housing scheme of this scale. The Society propose that residents of the site will be less likely to need a car, but on what grounds do they know that? The lack of parking spaces will create spill out into surrounding roads directly or indirectly - perhaps through visitors to the 'free' gardens - amenity - the concept of amenity suggests that a building project would be considered attractive and agreeable, adding pleasantness to a surrounding area. The design to date illustrates overdevelopment of six storey structures which will dominate surrounding homes and detract light, limit privacy and possibly present safeguarding issues for the adjacent school buildings and play areas - wildlife - 44 trees to be relocated in a limited landscape? Where is the plan for these trees? Trees are not just what is illustrated on the surface by trunk, branches and foliage - they have established and interlinked root systems - whilst on the surface it looks like the trees are accounted for, and the significant ones will be left in place, what about their roots? There is little detail, if any, about the affect the installation of utilities, drainage and water management which all require deep digging and excavation will have significant impact on the roots. The gloss of the</p>	20-Feb-23
--------	---	-----------

	<p>leaflet sounds reassuring, but the tree report from the tree experts shows more concern that must be factored into this decision. - historic buildings - this is the most significant project of scale in Clifton ever to be proposed, and must be in keeping with the architectural assets of the locality. The scale and design of the proposal jars with neighbouring historic buildings - conservation - the Society holds conservation amongst it's key objectives, but this proposal does not fully integrate the context of building conservation for all the elements, only in the existing buildings e.g. Clifton Pavilion and the Giraffe House - design - the standout flaw of this application is the scale of overdevelopment around the perimeter - appearance of the development - the glossy illustrations are misleading for many people who will take a leaflet at face value and believe the Society will deliver the application on based on those illustrations. The reality, sadly, is more likely to be that the Society will be long gone, having sold the site and secured the funding needed for the Wild Place Project site. As members of the proposed Management Board of the 'gardens' they will have no influence or say on the build project I object to this planning application, and hope that one evolves that is of better scale and is more fitting in local scale and conservation interpretation. As the Society's brochure says 'it is important we leave a legacy we can be proud of in this beautiful part of the Clifton and Hotwells Conservation Area'. Well then, do just that, not this.</p>	
677. O	<p>I object on a number of grounds, most significantly: - Loss of a historic and significant site which provides community value and encourages significant beneficial tourism to the area. - The need for change of use has not been proven - the zoo's financial performance was fine and the long term strategy was to continue to maintain it until there seems to have been a financially motivated change of heart to generate £ to invest in the new WildSpace site rather than commit to the historic Bristol Zoo site. - The proposed housing is far too large and overbearing and not in keeping with the area. IMHO it is totally inappropriate in design, scale and intent</p>	20-Feb-23



678. O	<p>Dear Sir, We wish to register our strongest opposition to the proposed application for development of the Zoological gardens in Clifton. I was born in Clifton and have been involved with Clifton properties all my life. First as a tenant and then when I married an owner. Like many others my wife and I have put our hearts and souls into maintaining and improving the properties that we own. Never in our wildest dreams could we conceive such an appalling scheme for these wonderful gardens. In all honesty it is totally beyond our comprehension that something so crass as this has been proposed for one of the jewels in Bristol's crown. The buildings are more like prison blocks than apartments and in no way can they possibly enhance and improve the area for future generations. It will be a disaster should greed and avarice be allowed to win the day! Just the loss of so many trees should be sufficient enough to oppose the scheme.</p>	21-Feb-23
679. O	<p>I would like to register briefly my objection to this development project. It seems amazing that a project of this kind is seriously being considered. It is quite obvious that the appearance of the buildings that would be erected are not appropriate for this conservation area and will cause irreparable damage to the natural and cultural character of this neighbourhood. The loss of so many mature trees is also unacceptable. I live in a flat in Clifton and every time I asked Bristol City Council whether I could improve the energy efficiency of this flat by installing double glazed windows or new, more efficient sash windows with wooden frames, I was told that this is not acceptable. The same applies for minor changes proposed to a totally hidden roof area. Having now realised the sort of changes that would take place in Clifton with this new development, I must admit I am shocked by the double standards.</p>	21-Feb-23

680. O	<p>As a near neighbour of Bristol Zoo Gardens, I have been affected negatively and relentlessly by every stage of the development proposals. Our contact with the "zoo committee", both through Zoom and at gatherings, has been politely restrained, always cordial, but frustratingly fruitless. The suggestions that my neighbours and I have raised with "the committee" have only been addressed marginally with the most minor tweaks here and there, the overall modifications to our requests being superficial and barely perceptible. The big picture remains much the same as it always has, with structures of 4, 5, and 6 storeys looming high and at close range. 1. The key complaint is the excessive size, scale, bulk and massing of the proposed development in close proximity to our homes as well as dominating this Conservation Area. Besides dwarfing our residences, the immediate area will suffer as the surrounding suburban roads are reduced to shadowy canyons - and the shadows will be undeniable. The considerable pedestrian 'traffic' on the pavements, especially for younger pupils, will no longer enjoy full daylight in the shrouded route - nor will visitors to the proposed park within. 'High Rises' will smother this neighbourhood beyond recognition. 2. Computer generated images produced by the zoo are comical in content, verging as an insult to our intelligence and our familiarity with these perimeter roads. Mature trees appearing immediately inside the zoo wall do not presently exist, nor would they reach such a stage for another 50 years. Furthermore, given their proximity to the projected buildings, there is no way in which they could survive and provide a shield to buffer the current residences. 3. The modernist monolithic architecture would be more appropriate in an entirely different setting or cityscape, not in a residential Conservation Area consisting of listed buildings and handsome Victorian homes whilst also abutting the classic setting of a prominent school and its impressive campus. Sight lines will have clearly been violated in multiple locations. From street level, gone are the glimpses of trees and the abundant daylight. Equally so, gone are a large proportion of mature trees within the 12 acres, all of which enrich the healthy well-being of this area. The artists' impressions take great liberties in distorting reality of the scene. 4. The towering height of these overbearing Blocks of Flats would adversely affect and diminish the daylight, directly and indirectly, onto properties, pavements and roads, as has been confirmed by the professional light studies which were commissioned by my neighbours. Apart from reduced daylight, the present outlook from these properties will be obliterated by apartment blocks directly opposite and at close range to our homes. Nowhere else in Clifton can be said to afford such an opportunity for prying eyes across narrow roads on such a grand scale. 5. Public 'benefit of access' to the proposed site is insignificant compared with the free public access provided by the nearby spacious Clifton Downs which have no overlooking monotonous houses, but feature trees, space and open skies. Who would choose to visit an artificially created enclave, surrounded by blocks of flat and in the proximity of other visitors, yet with The Downs so nearby? Bristol Zoological Gardens would leave a lasting legacy to this community if the emphasis remained on its splendid gardens. The proposals include the decimation of a majority of its mature trees. This development is alien to the character of this site as part of a Conservation Area as well as being a Historic and Community Asset. If all of these are violated by a brutalist style housing development on such a grand scale, little praise can be offered for the zoo's proclaimed intent for conservation. Detailed and persuasive arguments were submitted by Humphrey's &amp; Co on February 6th, which I recommend and to which I defer. To conclude, the major fear of these proposals is the ghastly height, size, scale, scope and proximity of</p>	22-Feb-23
--------	--	-----------

	<p>buildings which, in no way, blend with the local community. If approval is given, they will prove to be an appalling intrusion to the immediate neighbourhood and to the character of Clifton as a Conservation Area.</p>	
681. O	<p>The size of the proposed development is totally out of keeping with the local area and impacts negatively on the Clifton conservation area. The proposed felling of over 40% of trees on site does not conform to conservation guidelines. The site will unsafely mix a huge increase in traffic on the site with pedestrians and there is no guarantee that the site will remain open to public pedestrian access in the long term. This reduces an open space amenity and increases pollution and built up areas. Whilst the site proposes to have affordable housing, it is unlikely to be in high enough numbers to meet housing needs, instead providing high net worth individuals with luxury premises at the expenses of demolishing or converting historic buildings of community and cultural value. Change the use of the site by all means but do not grant permission to developers motivated by profit with no thought to a valuable community resource and open space.</p>	22-Feb-23

682. O	<p>There was a time when Bristol Zoological Gardens elicited warm praise and loyal appreciation from Bristol residents, as well as from far afield - roadside directional signs attest to that. Alas - No more. The stunning oasis of calm, so conveniently situated within the community, will be severely diminished as an inspiring social and learning venue, surrounded on all sides by towering structures of massed humanity - hardly a conducive setting for enjoying a day out in "natural" beauty. I'll take the Downs and Ashton Court any day. The relentless lines of vast perimeter flats fail to reflect this Conservation Area. Local homes near the site, as well as a very large school, will be overlooked from all angles by their close proximity. Balcony potted plants and quirky animal murals will not disguise the boxed brutalist style of these monoliths which in no way enhance the area or preserve the character. A Clifton Carbuncle sums it up accurately. Anything which is constructed must correspond in height, scale, shape, form and proportion to existing buildings in the vicinity, and there are a significant number of listed and locally listed buildings on the doorstep, whether residential or within the College. The proposed designs fail to reflect these imposing architectural styles, even worse with such an abrupt clash at close range.</p> <p><b>The Roads:</b> These will suffer from traffic overload and pressure for parking, especially with the elimination of road space due to the proposed access points for vehicles and pedestrians. Considering the City of Bristol's commitment to traffic reduction and elimination, this is a recipe for further pollution and mayhem, exacerbated by the daily school run. Pupils of all ages traversing the roads to lessons will face increased jeopardy for safety.</p> <p><b>Northcote Road:</b> Consider the narrow one-way thoroughfare with a single pavement, where residents will be overlooked by 4 and 5 storey structures. A similar fate awaits the school for its many teaching buildings, playground, library and boarding houses. Tall buildings, lining one side, will smother the outlook as has been cited in light surveys. Elsewhere in Clifton, where buildings of such height exist, they aren't directly opposite or nearly so close to each other, or so near the pavement.</p> <p><b>Light Surveys:</b> I defer to my neighbours who have found, through professionals, that BRE guidelines will have been breached, although it's blatantly obvious that the reductions will be considerable, especially for those at lower elevations. Winter light, especially, will simply be eclipsed to an intolerable degree. Those with lofty views, although receiving more daylight, will still be confronted with a walled expanse from most angles.</p> <p><b>The plan itself:</b> There is no clear indication in the published plans of how the proposals will actually LOOK from key views. An artist's impression is not good enough with such a watered down, softened appearance intended to look more appealing.</p> <p><b>Landscape in the Zoo site:</b> I refer to the detailed BTF analysis for a number of shocking statistics, regardless of the replanting scheme. Depressing is the projected net loss in biodiversity of 22%, in contrast to the Zoo's projection of a net gain of 38% Even more depressing is the planned loss of a third of the mature trees. The present Zoo, uniquely, is a masterpiece of GARDENS, as is proudly proclaimed in its name. Plans for the development of communal public parkland cannot possibly keep or maintain such a paradise that has been created over the decades. This alone will be a huge loss, even at ground elevation.</p> <p><b>Infrastructure in the Community:</b> 200 dwellings would suggest a population surge of twice that number. Can the public services manage that, bearing in mind the need for medical appointments and other services? The total number of dwellings in this area has grown gradually, but a surge would be detrimental in this environ.</p> <p><b>Pollution:</b> Much has been said about the environmental benefits of this project, but the pollution generated in the area during construction will be undeniable and permeating. This will not be a case of</p>	22-Feb-23
--------	---	-----------

	<p>"Wait till the dust settles." The cement pollution alone, during construction, has been proven to affect those, especially with respiratory conditions -- and seriously so, lasting for life. In a similar vein, the mental health of pupils and residents will surely take a knock, just as it is during these deliberations. And finally: It is obvious that I strongly object to the proposals on many counts. Most immediately is the sheer size and scope of the plans regarding structure, height, style and the volume of housing. As has been stated by others, the original founders of the Zoo would be saddened and shocked to know that a housing estate is on the cards. The plans are completely out of character with the surrounding Conservation Area and come not even close to enhancing or improving it. Housing is not the appropriate answer for the Zoo's legacy. But - if it must be so, a far smaller scale should be the ultimate aim.</p>	
--	---	--

683. O	<p>I am concerned about the scale and number of the additional residential buildings that seem totally out of keeping for a conservation area. This large construction project that will bring significant heavy goods vehicles and plant machinery during construction will have a detrimental effect on local traffic, increase pollution and could compromise schoolchildren's safety in Guthrie Rd and College Rd. If and when completed, this scheme will bring with it too many additional residents' vehicles for the inadequate parking proposed for the development. A spurious assumption that residents probably won't have vehicles would not I'm sure hold water. These additional vehicles will invariably park in the local residential roads that are already choked with cars especially during University term times when we are inundated with student vehicles that rarely move. The proposal that will bring yet more vehicles to Clifton without providing any additional parking is surely counter to BCC's environmental and transport policies and certainly impacts on residents such as ourselves who do not have off road parking. It appears obvious that high density, high price housing planned to enrich the developers is driving a proposal that will add little to the local community, will increase road traffic and pollution whilst removing an historic and aesthetically appropriate visitor attraction. I totally understand the Zoo's need and wish to move and understand that something must use the valuable space they vacate. The alternative proposal floated for a future environmental visitor attraction seems to have many merits. But I object totally to the proposal for high density scheme that does not consider the impact on the local community as currently configured.</p>	22-Feb-23
684. O	<p>This is a disgusting waste of an important site which is important to the heritage of Bristol and the memories of its residents, it should not become another site for apartments for wealthy people. It's a disgrace and the money spinning of Bristol Zoo is an insult to the important heritage they have inherited and should be safeguarding. Their plans for a new 'zoo' seem to lack both animals and attraction. This site is a site filled with important memories and aspects of Bristol's history. If it is not going to continue as a zoo (meaning thanks to Bristol Zoo's rubbish omens there will no longer be a zoo in Bristol) then it should become either a public space people can use or a museum.</p>	22-Feb-23
685. O	<p>i object to the housing development at bristol Zoo. i have been there for college and as kid. it would be a shame to see bristol zoo become something that means it can no longer be a zoo. it should stay as a zoo and remain as a zoo</p>	22-Feb-23
686. O	<p>A dreadful loss of a public amenity and historic site. The zoo is part of the fabric of Bristol and no evidence it needs to be closed with no other possible outcomes</p>	22-Feb-23

687. O	The decision to close down the site should be reconsidered as it seems not to have followed good governance processes. The Zoo is a heritage asset that should be preserved. It has the same significance to Bristolians as the Suspension Bridge, the Museum, the SS Great Britain and the Picture House on Whiteladies Road. If the Council refuse these redevelopment plans then the Zoo would be forced to reconsider the closure. Time is needed to see if a public space can be created. I do not believe that builders will honour public access. The new buildings are large and out of keeping. It is not a brownfield site, it is a mature Victorian garden.	22-Feb-23
688. O	1Conservation Loss of trees and plants 2A "green city"replacing a green space and public amenity with a housing estate and car park 3Proposed buildings completely out of scale with the surrounding buildings 4Damage to Bristol heritage a city proud of its history , 5 th oldest zoo, internationally acclaimed	22-Feb-23
689. O	I strongly object to the plans to build a luxury housing estate on the site of the Bristol Zoo Gardens. The gardens have been open to the public for 186 years. The queues of people visiting the Zoo before it closed demonstrates its significance to generations of people of Bristol. The historical and environmental damage this development will cause are not justified. The whole of the beautiful gardens and planting on this site should be preserved with its mature trees, historical herbaceous border, various ecosystems and the amazing biodiversity it offers (per the BZS website) for future generations to enjoy. Examination of the financial reports for the Zoo show that the Clifton site is financially viable. Losses have been generated by millions of pounds being spent on consultancy fees to facilitate the sale of the site. Although there were no visitors during lockdown, the Zoo received £2.5million in business continuation insurance. Indeed the Zoo generates far more money and visitors than the Wild Place. The Zoo has misled the public into believing that the sale of the Clifton site is necessary as the only option. This is not the case as the KPMG report they commissioned includes other possible courses of action - none of which were presented to their shareholders. The Clifton site is listed as a local Historic Park & Garden and an Important Open Space. It should stay this way. There is much public goodwill and support to explore options that will keep this site as a public green space rather than a luxury gated housing estate "Saving Wildlife Together" is the motto of the Zoo. The Council should start by saving the wildlife and biodiversity of the Clifton site by saying No to the Planning Application.	23-Feb-23

690. O	<p>I strongly oppose the plans for the zoo gardens for the overbearing nature of the proposed blocks of flats that show no sympathy for the Clifton conservation area and the neighbouring buildings. lack of sympathy the design shows for this conservation area and its neighbouring buildings, the poor quality of the public park, loss of sunlight to neighbouring streets and the access issues around Guthrie Road. The proposed buildings give the appearance of a prison block and are totally unsuitable for a conservation area. The perimeter buildings are too overbearing, too large and extensive, too close to the perimeter and have no sympathy in scale or design to the neighbouring buildings. The new buildings completely overshadow and dominate the Zoo entrance building. The view of the site from the Downs will be a wall of modern buildings that remove the feeling of openness and visual amenity from the Downs where currently the buildings are well below the tree line. The main access point on Guthrie Road opposite the school is completely inappropriate for such a large site. This is a street with chicanes to slow traffic, which makes it hard for traffic to move along it. On top of that, the stretch of road next to the site entrance is used by the school to load and unload school buses several times each day- other streets being unsuitable for this purpose. If the main entrance is located on Guthrie Road, the number of dwellings on the site needs to be decreased significantly The public park is hidden away within this gated community with controlled access. The wall of tall surrounding buildings will deprive the park of sunlight and make the area feel walled in. The access roads within the site represent further loss of green open space. The beautiful heritage gardens will be ripped up along with established trees. This is not conservation. The neighbouring streets will lose sunlight for much of the year as they will be overshadowed by the excessively tall, uninterrupted blocks of flats.</p>	23-Feb-23
--------	--	-----------



691. O	<p>I strongly object to the plans for the Bristol Zoo Gardens. The layout of the site, with overly tall buildings around its perimeter, and narrow gated access makes it feel unwelcoming to the public. Much of the public garden space shown on the plans is actually access road and should not be classified as garden space especially as most of the car parking spaces are in the central part of the site. There is no similarity to the amenity of the current zoo gardens. There does not seem any guarantee that once the development is completed that public access will be maintained to the gardens in the long term. Such access is more assured if the public gardens form a solid area fronting onto Clifton Downs Road rather than lost within the gated community. I object to the loss of a visitor attraction that brings people into Clifton from outside Bristol. The community conservation centre is unlikely to have the equivalent economic value to the area and this negative impact has not been taken into account in the economic report. The public gardens have been dubbed down into an area surrounded by and crossed by access roads that are overlooked and shaded by excessively tall buildings around its perimeter and within it. I object to the amount of traffic that will be generated around the local roads of the site by this volume of housing plus that of the West Car Park site. No account seems to have been taken of parking needed by visitors to the residents of these sites. The loss of the car parks on Clifton Down Road is not mentioned. These visitors and the Clifton College drop off/pick up traffic will create substantial parking problems in the area with cars driving around looking for parking spaces, on top of all the additional traffic wanting to access the site. All this excess traffic is of a concern for the safety of the pupils of Clifton College who spend a lot of time each day walking between buildings in this area. The density of the development is too great to maintain public safety around this site. I object to the design of the perimeter buildings. These are all too tall, reducing the light into the public gardens substantially. The surrounding roads will feel like dark alleyways - especially College Road with blocks of flats situated close to the road on both sides. The architectural design bears no relation to the historical buildings that have been preserved nor to the surrounding buildings of Clifton conservation area. I object to the view of the site from the Downs with its 6 storey tall buildings built up to the boundary wall. The frontage should be no more than the current two storey height.</p>	23-Feb-23
692. O	<p>I object to this development on the basis that it will result in a loss of Communal Value. I have a young family and we have visited the Bristol Zoo many times with family and friends. My children love this space and it will be a real shame to lose such an historical site.</p>	23-Feb-23

693. O	<p>We are incredibly disappointed at the closure of the zoo. It was one of the main reasons for choosing to live and invest in Clifton. We chose Clifton as a place to live and raise our children because of its local amenities, good schools and level of safety. We feel that the closure of the zoo was unjust and if so many other businesses could bounce back after the pandemic so could the zoo which was one of our safe havens during covid when it was open. We also feel that removing a green site and 46% of its trees is not right. It is a beautiful and historic site and is one of Bristols landmarks. Our friends and family who travel to visit us from the UK and abroad have always looked forward to visiting the zoo with us a family. We don't believe that the alternate site is as promising as the Zoo CEO says it is and certainly is not an attraction that we as a family would travel to see. SAVE OUR ZOO AND COMMUNITY!!!</p>	23-Feb-23
694. O	<p>Comments: Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. And should of being listed in totality. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	23-Feb-23

695.	O	Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. And should of being listed in totality. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park & Garden and an Important Open Space.	23-Feb-23
696.	O		23-Feb-23
697.	O	I object on the grounds of harm to overall historic interest. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. I object to these planning plans and to the entire concept of turning the zoo into a property development scheme. Sure change the zoo but don't destroy it! The need of change of use is not proven.	23-Feb-23
698.	O	I object on the grounds of harm to overall historic interest. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. I object to these planning plans and to the entire concept of turning the zoo into a property development scheme. Sure change the zoo but don't destroy it! The need of change of use is not proven.	23-Feb-23
699.	O	It is a corrupt and outrageous thing that brings ignominy on our council and business people to allow the closure of our zoo and to them take away the land from Bristolians. This is an exclusive decision that the majority of the city oppose.	23-Feb-23
700.	O	This is a disgraceful ugly exclusive plan that will impact the area negatively in appearance and architecture. Plus the corrupt dealings around it will be probed for evermore especially to hold certain people to account.	23-Feb-23
701.	O	I would like to register my strong opposition to this planning application. Whatever happens to the zoo, the gardens should be retained, with the historic animal enclosures, for the enjoyment of all the residents of Bristol, as it was set up in the first place. I have personally enjoyed many days at the zoo with my children and grandchildren. It has always been a safe place to go to play and learn about animals and I hope both of these aspirations will continue.	23-Feb-23

702. O	<p>Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. And should of being listed in totality. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	23-Feb-23
703. O	<p>Comments: Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. And should of being listed in totality. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	23-Feb-23
704. O	<p>I object on the grounds of harm to overall historic interest. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. I object to these planning plans and to the entire concept of turning the zoo into a property development scheme. Sure change the zoo but don't destroy it! The need of change of use is not proven.</p>	23-Feb-23

705.	O	I object on the grounds of harm to overall historic interest. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. I object to these planning plans and to the entire concept of turning the zoo into a property development scheme. Sure change the zoo but don't destroy it! The need of change of use is not proven.	23-Feb-23
706.	O		23-Feb-23
707.	O	I strongly object to the sale of the zoo. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored.	23-Feb-23
708.	O	I object to the sale of the Bristol zoo - Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. In addition, the need for change of use is not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored.	23-Feb-23
709.	O	I object to this property development project as it causes unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. In addition, the need for change of use is not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored.	23-Feb-23
710.	O	I strongly object that the only solution for this site is housing. I feel that the Bristol Zoological Society have not given any consideration to alternative use of the space. If given away to housing, Bristol & its visitors will have lost a unique piece of cultural space for all to use and benefit by. I hope that there will be enough public support to at least delay a decision on its future. We owe it to the founders and sponsors of the Zoo to at least be open and debate this issue and not to steamroll into permanent redevelopment of a beautiful landmark. I and others will be pressing our City councillors and trustees of the Charity to think and search their consciences to make a reasoned decision to benefit all and not the few.	23-Feb-23
711.	O	I object to the application in the strongest possible terms. The application is in itself an act of cultural vandalism. The proposed development, by reason of its siting, scale an overall design an appearance, would harm the character and appearance of the Clifton Conservation Area. It would have a devastating impact on Clifton and Bristol. My understanding is that, if the application is approved, there is no right of appeal against that decision. However, there s an avenue of legal redress by way of an application for judicial review, which has succeeded in many similar cases.	23-Feb-23

712.	O	I strongly object to the sale of Bristol Zoological Gardens to a property developer. For 187 years it has been an integral part of the life of those of us who live in Clifton and in the wider Bristol area. Like many who live in Clifton I do not have a large garden and the zoological gardens have always been a green and safe place for my children and grandchildren to play without fear of cars or dogs and also a place for them to learn to appreciate the trees plants birds insects and animals that live in this beautiful space - not only those in captivity but those who choose to live there of their own accord. Once all this is destroyed it will be impossible to replace and Bristol will be a poorer place to live.	23-Feb-23
713.	O	Don't do it.	23-Feb-23
714.	O	The level of debate with local residents was poor at the outset. The suggested buildings are not sympathetic to the area. A communal green space could be an alternative which could be used by everyone in Bristol, a Bristol gardens. Many trees will be removed which is at odds with the governments green policies	23-Feb-23
715.	O	We are incredibly disappointed at the closure of the zoo. It was one of the main reasons for choosing to live and invest in Clifton. We chose Clifton as a place to live and raise our children because of its local amenities, good schools and level of safety. We feel that the closure of the zoo was unjust and if so many other businesses could bounce back after the pandemic so could the zoo which was one of our safe havens during covid when it was open. We also feel that removing a green site and 46% of its trees is not right. It is a beautiful and historic site and is one of Bristols landmarks. Our friends and family who travel to visit us from the UK and abroad have always looked forward to visiting the zoo with us a family. We don't believe that the alternate site is as promising as the Zoo CEO says it is and certainly is not an attraction that we as a family would travel to see. SAVE OUR ZOO AND COMMUNITY!!!	23-Feb-23
716.	O	I object to this development on the basis that it will result in a loss of Communal Value. I have a young family and we have visited the Bristol Zoo many times with family and friends. My children love this space and it will be a real shame to lose such an historical site.	23-Feb-23

717. O	<p>Granting permission to build apartment blocks by turning this open space into a concrete jungle, with buildings standing at 6 stories high, will never be sensitive or in keeping with the surrounding architecture and current beautiful gardens. We all know that this is a listed historic park and treasured open space. What are you as councillors doing to uphold and protect this, because as we all know, once a green, open and public site gets obliterated, it can never be transformed back to what it was again. History will be lost. Proposals of the gardens being "open to the public" is a farce, it's impossible to guarantee how long the gardens (if at all) will be open to the public. It's obvious that the residents will want the gardens to be private and will have no obligation to open it to the public - why would they?! As far as objecting this, it's nothing about being entitled neighbours, it is about being a normal local person of Bristol who have the knowledge of the full extent of manipulation behind the Zoo's PR. We, as Bristol people, know that we have been duped into lies and false claims of what is happening to the few green spaces left in the city. A promised conservation area (apparently run by a 'conservation and education charity') could be entirely obliterated and tarmacked over. How can you justify any development from a charity, this 'charity' is a con, there is nothing charitable about any of their plans and if granted this site will always be known as a fat cat financial gain for a few. You have the power to not let this happen. This is an educational space, an environmental haven that is currently not being respected. It must be opened up to the general public, the Bristol tax payers, the people of Bristol. Closing the zoo and developing the site in the KPMG report was one of seven other options - please do not rob this from the thousands of people who enjoy, love and cherish this National Treasure of a site. If approved, the increased amount of traffic and parked cars commuting too has been proved that it will be a major pollution concern. There are other knock on effects of just covering up a green space, their are air quality concerns, road safety for multiple local school children and serious health implications of pollution being brought into the area with more people and cars. Thank you for taking the time to read and digest my serious concerns for any concrete development at this site.</p>	23-Feb-23
718. O	<p>I strongly object to this application for the following reasons: 1. The building proposed are too high and overpassed 2. The design is out of keeping the surrounding buildings which include many listed buildings and houses of historical interest 3. No credible justification has been given for the Zoo closure 4. Research appears to have revealed that the Zoo was profitable and that income has been squandered on consultancy fees 5. It seems that the Zoo's accountants offered 7 future options to improve profitability - only one of which was closure. The other options have not been disclosed and possibly not explored. 6. The decision has been taken by a very small number of people and without proper consultation with the people of Bristol 7. The infrastructure needed for this development would irreparably damage the roots of important trees and it is estimated by the planners that a large number (up to 42% would disappear) 8. A large part of the gardens will be built on and such as remain will be subdivided and surrounded by road and parked vehicles. It seems unlikely that the residents will be prepared to pay for their upkeep 9. I feel strongly that the whole garden should be saved as a park for the use of the Bristol public Professor Ian Sutherland 8 Canynge Square Bristol BS8 3LA</p>	23-Feb-23

719.	O	I object to the loss of mature landscape being cleared for building. What is the point of planting trees in an effort to aid the environment only to then bulldoze long established trees.	23-Feb-23
720.	O	I would like to register my strong objection to the proposed plans for Bristol Zoo. I grew up in Bristol and spent many days at the Zoo learning and enjoying the open green spaces. The current plans will destroy this for future generations, decreasing Bristols value as a place to live. Bristol Zoo is a historical site and an important landmark which the public value highly and should not loose full access to. I also feel it is wrong and unnecessary to lose so many of the mature trees at the site which would be a loss for the local biodiversity. The need for change of use is not proven and the only solution should not be housing. Alternatives for a public site should be considered.	23-Feb-23
721.	O	I lived near the zoo for many years and object to it being developed for housing. My first objection is to the loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park & Garden and an Important Open Space and an important asset to the people of Bristol. I also object to the harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. Surely this is important and something for the people could be done with the site to make it a going concern.	24-Feb-23



722. O	<p>AMENITY Summary of objection: The proposed plans do not retain sufficient amenity space. The ratio of development to retained space is inappropriate and unacceptable. The development as a whole is overly-dense and inappropriate both for the Zoo Gardens site and in the context of the surrounding area. Detail: The proposals do not adequately address how public amenity space will be supported and protected into the future. Views are expressed that objections to the proposed development are based in NIMBYism - that affluent middle class locals in Clifton are up in arms because of the impact of the development on their neighbourhood and house values. This is a profoundly unhelpful and divisive argument. The concerns about loss of amenity under these proposals would apply wherever the Zoo happened to be located. This should concern all stakeholders. The amenity of the Zoo is measured in its unique value to the City as a whole - to all of its residents and communities, to visitors to the City, to its contribution to income from tourism and to the City's profile and reputation. Historically the Zoo has worked to extend its reach to everyone. It could undoubtedly do much more, but it remains the case that it is an accessible attraction and the community space and gardens should be preserved - as are for example the Clifton Downs - for the benefit of all. The quantum of housing and developed proposed in the Application is inappropriate for the site and the surrounding area. The housing is too extensive and the elevations are too high. Insufficient acreage is retained for public amenity. At the heart of the proposal for development is a fundamental conflict between providing high value housing on the site and maintaining public access - who will control access? When will it be allowed? Will it be free? Who will monitor use of the gardens? Who will attend to (and pay for) security? Potential purchasers of expensive housing on site are extremely unlikely to want unlimited visitor access around their properties. This factor is not adequately addressed in the Proposals.</p> <p>CONSERVATION AND HISTORIC BUILDINGS Summary of objection: The Proposal fails to protect significant historic buildings on the site. It is at odds with the Council's own policies for the surrounding Conservation area. The plans do not merit exceptional treatment. Detail: The Zoo Gardens site is of historic importance, and structures within it have protected status. Planning restrictions apply without exception to all other buildings in the surrounding area, restricting development. These restrictions exist for a reason - to ensure that the historical fabric of the area is maintained and that any proposed development is sensitive and controlled. The Proposals for a dense, modern housing scheme with unrelieved elevations are not sensitive to the site nor to the surrounding area. In the plans, much of the existing historic gardens appear to be removed to gain development density. The Tree Removals Plan (LUC-11585-LD-PLN-011) is one example, which appears to suggest that approaching 40% of mature trees stock will be cut down. Several large tracts of established areas of garden will be removed. This irreversibly damages the public amenity offered by the site. It runs a coach and horses through statements made by the Applicant that conservation and preservation of the natural environment is centrally important.</p> <p>DESIGN AND APPEARANCE Summary of objection: The proposed development as a whole is astonishingly ugly. The proposed building elevations are far too high and out of all symmetry and proportion with the site itself and the surrounding buildings. The architects could not have done a better job of designing a series of truly horrible 1970s style units. Bristol deserves better, rather than showing the world exactly how not to make best use of a beautiful and unique historic site.</p> <p>DUE PROCESS AND PLANNING PROCESS Summary of objection: The case for development of the Zoo Gardens site has not been the subject of proper public consultation. Valid</p>	24-Feb-23
--------	---	-----------

	<p>concerns exist about the basis of Bristol Zoo's decision to sell, and the conduct of the Board of Trustees. Approval of this scheme would be a deeply reckless step on the part of the Planning Committee and extinguish any opportunity for wider (public) consideration of options for the Zoo Gardens. Any such decision may also in time prove to be one which would undermine the reputation of the Council and City of Bristol. Detail: I am concerned that the decision to sell the site for development has been ill thought out, has ignored alternative proposals to secure the future of the site, and has been founded on public statements about future economic and financial viability which are unproven. There have been suggestions in public that the Zoo Board's conduct in securing shareholder approval was at best high handed and at worst manipulative. There has been an absence of public consultation which - given the history and prominence of the site - is both shocking and unjustifiable. Imagine this process happening for London Zoo? (No I can't, either.) The Board's responsibility to consult extends not just with those who have funded or donated, or left legacies to support the operations of the Zoo and its upkeep as a public space, but to all stakeholders. Decisions made in private session are wholly in conflict with the legal responsibilities of Trustees. The decision to sell is also at odds with the stated charitable objects of the Zoo and its overarching responsibility to act in the public interest. If any of these concerns over due process are shown to have foundation, the Board of Trustees may - may - have been found in time to have acted improperly. The relevance of this in planning terms is that if Planning approves this scheme, any opportunity for proper public consultation or the development of alternative proposals will be permanently lost. It will effectively cement 'sale with planning for development' as the only option for the future of the Zoo Gardens. This leaves the way open for any future owner of the site to bring forward alternative, potentially more densely designed schemes - or to leave the site to deteriorate in the hope of a more favourable future planning environment borne of desperation just to see something happen with it. Plenty of examples of such sites exist.</p>	
723. O	<p>The loss of this historic and integral part of the City of Bristol would be devastating. I strongly object to the idea to the planning proposed for this site as I believe the entire site should be for the people of Bristol and remain as both a zoological and botanic garden. The long established gardens, the historic space, the children's activity areas and the vast learning opportunities currently on this area are unequalled in central Bristol. The message of conservation and green space, clean air, climate change and our wider world which is intrinsic to the zoo and all it stands for; to build housing here would wipe out this message. It is paramount that future generations continue to have access to this site for both for educational, health and social reasons. A housing estate no matter how luxury will not offer any of these things, I do not believe continued 'children's play space or gardens' will last long. It will be a permanent black mark against the city of Bristol if this historic, beautiful and vitally important space does not remain for the people of the city.</p>	24-Feb-23
724. O	<p>I object to the change of the natural ecosystem of the area.</p>	24-Feb-23

725. O	The gardens should be designed for everyone to be able to use them and not for private benefit. This is an important green space for the people of Bristol and has many historic buildings which the people of Bristol have enjoyed for years. Please do not act purely for profit but consider other community beneficiaries.	24-Feb-23
726. O	Please keep Bristol Zoo as a garden.	24-Feb-23
727. O	<p>I strongly object to the Bristol Zoological Society's proposals to redevelop Bristol Zoo for housing. I accept that there is a national housing crisis but I do not accept that it is appropriate to remove and redevelop important cultural assets of significant benefit to the regional and city community. It is irresponsible to contemplate such loss for housing. I object on three grounds. (a) The planning application is unlawful in failing to be subject to Environmental Impact Assessment. (b) It is necessary by law for Bristol City Council and the applicant to pay special attention to preserving or enhancing the character or appearance of the conservation area. The planning application is unlawful in failing this test and in paying minimal regard the character and appearance. (c) The proposals, if approved and implemented would remove an internationally recognised Cultural Institution and a Community Asset, in conflict with policy. 1) The planning application breaches EIA Regulations and Case Law in salami slicing the property in order to avoid EIA being undertaken. The West Car Park and the Zoo Gardens should be subject to EIA to assess the significant environmental impacts of each proposal and the cumulative environmental effects. The two sites are linked by virtue of ownership and by virtue that one is operationally linked to the other. The Townscape and Visual Impacts are severe. 2) The application proposals breach the Planning (Listed Buildings and Conservation Areas) Act 1990 (the "LB &amp; CA Act") in failing to preserve or enhance the character or appearance of the area (Article 72(1)). Clifton Conservation Area was designated in 1970 and the Conservation Area Appraisal was updated in 2010. The Clifton Conservation Area Appraisal lists Bristol Zoo among six "crucial landmarks nationally and on Bristol's landscape" (para 6.3.2); and states, "The variety and quality of views in Clifton are a critical component of the area's special interest," (para 6.2.3). The proposals conflict with Long View L25, Local View LC21 and a Landmark of City Wide Importance (see Map 4). The cumulative effect of high density housing development on West Car Park and Bristol Zoo will result in a canyon effect. This will result in substantial harm Long View L25. High density insensitively design development on Guthrie Road will cause substantial harm to listed assets at Clifton College on Guthrie Road. The proposals substantially conflict with listed buildings, heritage and the Clifton Conservation Area, in conflict with the Appraisal and the LB &amp; CA Act. Core Strategy Policy BCS22 requires that "Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including ... Conservation Area." The proposals conflict with Policy BCS22 with regard to scale, design and massing. I do not accept the position of Historic England. These proposals will result in substantial harm to the Conservation Area and the important listed buildings on Guthrie Road at Clifton College. (3) Bristol Zoo is a quasi community use. It is no different in community significance to St George's Bristol (a privately owned institution for public use through paid access) or Bristol Beacon (publicly owned for public use through paid access). Bristol Zoo is similarly privately owned for public use through paid access. The point being that these are national important public assets, each of which provide Community Facilities recognised under Core Strategy Policy BCS12 and each is "easily accessible by walking, cycling and public transport, and re open to</p>	24-Feb-23

	<p>all members of the community." It is not acceptable to simply accept the Zoo's case that the use in Clifton is no longer viable and therefore allow the Zoo to be redeveloped for housing. The Zoo Gardens are in community use and should be retained for community use, and every effort should be made to seek alternative community uses - a test set by most other Local Planning Authorities. It is reputationally reprehensible to contemplate it being acceptable to remove and replace a Nationally Significant Cultural and Community Institution with housing. We need to protect our heritage and cultural spaces for future generations, which is part of what Sustainability is about: protecting spaces for future generations. Careful consideration should be taken over the most appropriate locations for new housing, which is much needed, but not at the expense of national significant places rich in culture, nature and biodiversity. Planning Committee should think long and hard. We need more housing but at what price to nature, culture, amenity, community? If the Bristol Zoological Society no longer wishes to operate a zoo, then other community uses must first be explored. This planning application should be refused and or deferred for further consideration.</p>		
728.	O	<p>I would like to see this space continue to be used for conservation, education, biodiversity, and overall a beautiful public space to enjoy. I don't think residential units would provide any of these things</p>	24-Feb-23
729.	O	<p>I object to the plans on the following grounds: 1. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. 2. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. 3. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	24-Feb-23

730. O	<p>I object to any housing development on this site on the following grounds: 1. It is probably one of the most loved, visited, nurtured, maintained Bristol heritage sites. My grandmother, born circa 1880, had family membership there and her great great grandchildren similarly visited the zoo and gardens up to its closure. Countless Bristol families share similar associations. It should remain 100% open to the general public to use and enjoy as a unique outdoor space. It should not become a housing estate. 2. The sustainability/green/ reducing carbon footprint argument for moving the zoo to Wild Place is vacuous. Most Bristol visitors will have to use motorised transport to reach Wild Place making a longer journey. Meanwhile the proposed housing estate residents will be adding to the already busy roads crossing the Downs/ or the city centre in order to approach the zoo site. Increased carbon footprint in both cases. 3. Bristol local government/leaders have sanctioned too many housing developments which have not lived up to expectations e.g. the long awaited housing developments round the harbour. We cannot afford yet another mistake in which a place of natural beauty is ruined. Once the iconic zoo buildings, flower beds, lake and trees are destroyed we can never recover those historic features. Please think again.</p>	24-Feb-23
731. O	<p>I believe there will be a colossal loss of Communal Value. This is part of what makes Bristol, Bristol. We have to stop these important historical sites, loved by generations disappearing from us, without a public fight. We saved Whiteladies Cinema, Bristol Old Vic and there has been no real or public attempt to save Bristol Zoo. The site means so much to people of Bristol, the generations that have visited, weddings held, ashes scattered. I understand the need for selling this site has not been proven. It has been made by a few people and not with the option to keep it open. The need for an open and safe space for my small children to be able to enjoy the outdoors will be taken away. The public green space proposed is much smaller, will have roads with many cars, bikes and delivery drives going through on a daily basis will mean it will not be a safe open space and that sense of freedom children can get from being able to safely explore will be gone. None of the other options have been explored, when the site was decided to close and I believe we should have new options explored publicly.</p>	25-Feb-23

732. O	<p>I am writing to object to the proposed development of accommodation and associated parking on the site of a local community facility - the historic Bristol Zoo Gardens. My objection is based on the material loss of amenity proposed by the development, which appears to have been hastily proposed on the back of COVID financial after effects, (which have since been proved to be unnecessarily pessimistic), as have been detailed by the Downs for People comments and not reiterated here. At the very least the negative financial implications of maintaining two complementary zoo sites, if both provide different animal environments, needs to be revisited. The implications of moving an economic resource from a Bristol visitor attraction to a South Gloucester visitor attraction does not appear to have been considered. The amendment and destruction of historic buildings and amenity do not seem to me to be justified without a much wider consultation of how such amenities can be preserved and developed, (whilst preserving the zoo in a form acceptable to modern ideas of small animal welfare) for further generations of Bristol residents and visitors. It is not idle sentimentality to seek to preserve the oasis of the Zoo Gardens. The loss of nearly half of the mature trees and a car free environment is surely out of sync with these times of increased consciousness of climate change and a lauded 'green' city, despite the adjustments proposed to the development. There is no guarantee that public access will be maintained to diminished gardens, especially if residents are expected to cover the cost through their service charges. At the very least the planning department should delay a decision permitting the development to go ahead whilst other means of maintaining the existing amenity are explored more fully. As someone who used the zoo for many years and am still an occasional visitor, I had been under the impression the zoo had already been sold, and that there was therefore no chance of working to secure its future for others to enjoy. After all, although the KPMG consultant's report on potential ways of developing the zoo as a site gave a number of options, the only option put forward to the shareholders or shared more widely was the option of selling the site. Please do not take a hasty decision, the detrimental effects of which can never be undone.</p>	26-Feb-23
--------	---	-----------

733. O	<p>I am writing as a concerned citizen of Bristol in response to the very deep concern about the development of the Bristol zoo site. I am of the very strong belief that the site must be retained as a community asset rather than sold to private concerns that will result in the site being developed and its heritage status lost to the community. Since starting a family in Bristol we regularly used to visit the zoo as a wonderful and beautiful open space and gardens much to the tremendous delight of our children. This has been the case for hundreds of thousands, if not millions of children and families throughout its long history. It has not only served the local Bristol community for well over a hundred years, but also the rest of the country where it has held iconic status. I remember watching Animal Magic with Johny Morris from my childhood home in Manchester and being enthralled, entertained and educated about the many different animals that came to my attention and how it promoted a lifelong interest with wildlife. Though I am happy for the main aspect of the zoo to move out to its new site where animal welfare will be better I am still of the opinion that the present grounds represent a heritage that should not be taken from the people of Bristol the principle to repurpose for the wider Bristol community is very strong. The site is a green space with beautiful gardens that have been appreciated by many generations of visitors. I hope that this green area is maintained, especially in this day of concern about the loss of the green environment and the general effects of urbanisation. I am aware that the green expanse of the Clifton Downs is on its doorstep but this should not be mistaken for more of the same with its nurtured gardens and heritage nature. I also have a concern that the height of any building work will seriously be a blot on the landscape within this low rise area. Indeed the lovely architectural heritage of this area must be maintained. On a political front if the residents of Bristol see what they deem as their heritage and belonging to them, again taken away by people and organisations of wealth then this will be seen as another insult to people of less means and an insult to a just society. This cannot be allowed to happen. Please refrain from developing the Bristol zoo site to the detriment to the local people, the wider Bristol community as well as the environment and wildlife.</p>	26-Feb-23
734. O	<p>I object to the planning application for Bristol Zoo Gardens on the basis that the application is wholly inappropriate. There will be a loss of a communal space, the gardens are listed as a local historic local park, there is a planned loss of trees and a public green space. There will be limited public access. The overall design of the buildings is out of character and not to scale with surrounding buildings. A gross overdevelopment of the site. There will be harm to listed buildings on the site.</p>	26-Feb-23

735. O	<p>Comments: Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. And should of being listed in totality. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	27-Feb-23
736. O		27-Feb-23
737. O	<p>I object on the grounds of harm to overall historic interest. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. I object to these planning plans and to the entire concept of turning the zoo into a property development scheme. Sure change the zoo but don't destroy it! The need of change of use is not proven.</p>	27-Feb-23
738. O	<p>I object on the grounds of harm to overall historic interest. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. I object to these planning plans and to the entire concept of turning the zoo into a property development scheme. Sure change the zoo but don't destroy it! The need of change of use is not proven.</p>	27-Feb-23



739. O	<p>Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. And should of being listed in totality. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	27-Feb-23
740. O	<p>An irreplaceable part of Bristol's heritage and identity is threatened. Bristol Zoo, as was frequently mentioned, is nearly 200 years old and is the 5th oldest in the world. It is city zoo, a rare thing in the UK and that helps make it part of Bristol's identity, as much as the Suspension Bridge, the docks, Bristol Museum or the SS Great Britain (the youngest addition). No one would sanction the Suspension Bridge if it got into economic difficulties, so why Bristol Zoo? The Zoo is an asset, part of what makes Bristol unique and gives our great city an identity; that identity is part of what makes Bristol attractive to visit, to live in and to bring business to. Heritage is proven to be vital to both social, spiritual and economic life. The Zoo is part of Bristol's heritage. Losing it will damage Bristol. The Local Economy has suffered from the current closure of the Zoo. Beyond so called 'soft value', the Zoo brings hundreds of thousands of pounds into the city every year. A trip to the zoo for a non-Bristolian brings money to cafes, restaurants, shops and other heritage sites in the city. The loss to local businesses is already being keenly felt. The Wild Place is not a substitute or replacement for the Zoo - if the Zoo goes, it dies; it will not be reincarnated elsewhere. It was claimed in its own publicity that the Zoo was moving to the Wild Place. This was such a spin on the truth as to easily be called a lie (and I'll get to some more of those in moment). The Wild Place is a very different set up to the Zoo and very few animals are moving there. It is its own entity and will continue to be so. Beyond the lack of and variety of animals at the Wild Place there is also a lack of beauty there. That may sound a bit esoteric but the Zoo isn't just the animals, it is also the exceptional Gardens. Many of the hundreds of thousands visitors might never have been somewhere with such visually stunning borders, trees and horticultural beauty. Long established gardens can bring you peace, wonder, and a reassuring sense of continuity, without you even realising. The Zoo Gardens provided calming food for the soul to go with the thrilling food for the mind provided by the wildlife there. And there was always ice cream for just actual food. The Wild Place will have some animals but not as many nor as varied as the Zoo has and it will have no gardens, no beauty. The sense of wonder on offer is halved. Shenanigans at the top - spin, concealing/massaging</p>	27-Feb-23

	<p>the figures, dictatorial decisions. Closing the zoo and selling the land for development as housing was presented by the execs to the shareholders as the only option. That meeting was by all accounts an ambush and the decision was presented as fait accompli. This seemed rum at the time, but since then further information has been trickling out that casts doubt on both the process and the decision. The KPMG report had other options none of which were revealed to or discussed by the shareholders. When shareholders asked to see these other options, they were denied. If closing the Zoo was the only option, why not share the report? What is being hidden? The attendance numbers for the Zoo have been falsely spun too. 500,000 visitors a year, and a gradual increase in the last few years leading up to Covid. The zoo was profitable too, also showing an increase in the years leading up to Covid. So why close a business that, but for a Covid blip, was on the up? Finally, Bristol Council's complicity in the decision to close is either only just excusable if the wool was pulled over their eyes too, but it's inexcusable and immorally complicit if they knew that other options were available but ignored them. Refusing planning is the first step on showing that the council are going to reexamine this decision themselves with impartiality and integrity. Whether it is ineptitude or malice, there is huge doubt about the decision to close which means the right thing to do is refuse all permission to develop pending a review or a reversal.</p>	
741. O	<p>Dear Planning Team, We are very concerned about the size of the planned developments. The buildings planned appear unsympathetic, overbearing and totally incongruous with this conservation area. The high storey domestic accommodation also worryingly gives residents direct line of sight into the neighbouring school, exposing the children. We object wholeheartedly to the current plans.</p>	27-Feb-23

742. O	I object on the following grounds: Loss of a considerable public and educational amenity for the whole of Bristol and beyond when it has not been demonstrated that there are no other viable uses for the site including as a reimagined zoo Loss of historic gardens, buildings and heritage assets contrary to the NPPF: there is no evidence of any public benefit which could be derived were this application to be accepted The proposed public access to the remaining gardens is permissive and not granted in perpetuity, meaning that as it would be funded by a levy on the residents, it is vulnerable to being withdrawn. Once developed, cars and service vehicles are to be allowed onsite undermining the character and tranquillity of the Zoo Gardens and its safe environment for families with children Poor scheme, design and scale of multi-storey buildings around the perimeter of the site are out of keeping with and would dominate the important surrounding listed buildings within the Conservation Area Loss of over 80 established and beautiful trees and their haven for wildlife	27-Feb-23
743. O	Still considering myself to be a true Bristolian, I was saddened at the decision to close the site. I regularly visit my home town and have fond memories of visiting the zoo with family and friends both as a child and as an adult. I regularly visited by myself up to it's closure. The location provided many hours of school educational, learning experiences and provided great opportunity for people from all backgrounds to experience so of the rarest animals in captivity raising awareness of wider global impacts on wildlife and conservation. The site has significant amenity, cultural and historical value to the people of Bristol and to the wider country. The suggestion to convert the site to a housing development again looks to be a money making step with little regard for the people of Bristol and the reflection for the cultural heritage. Bristol has lost a valuable visitor attraction within the city and whilst the new site will be larger it will not be as nearly accessible to all members of society It won't be a site that is in walking distance of other visitor attraction to encourage access during visits to the centre and other iconic landmarks and more over will not be within Bristol. The redevelopment will no doubt lead to loss of green space and impacts on eco system services and biodiversity as a result but as with all development will be a process of getting as many pounds out of the ground as possible. The proposed development will no doubt have more of an impact than suggested as is often the case. The development will not be of benefit to the people of Bristol and will only cater for the benefit of those who can afford to live there. Whilst I can not envisage the site being reopened as a zoological site,(more is the putty) I can't help but think that the site would be better as a greenspace, botanical garden to be used for public events, festivals, and recreational use, whilst helping improve the carbon impacts of the city rather than as another multiple million pound housing estate. For the reasons of impact to amenity, loss of ecosystem and green space, loss of cultural and heritage I can do nothing but object. This is a tragic loss of an iconic site and the council needs to take serious steps to prevent housing development and preserve / enhance and protect the site for future generations of Bristol folk and the wider country.	27-Feb-23
744. O	This is a disgraceful ugly exclusive plan that will impact the area negatively in appearance and architecture. Plus the corrupt dealings around it will be probed for evermore especially to hold certain people to account.	28-Feb-23

745.	O	It is a corrupt and outrageous thing that brings ignominy on our council and business people to allow the closure of our zoo and to them take away the land from Bristolians. This is an exclusive decision that the majority of the city oppose.	28-Feb-23
746.	O	I am heartbroken that the zoo has closed and the idea that this hallowed land is marked for residential development is truly salt in the wound. I believe it represents an enormous harm to the cultural, ecological and social value of Bristol and, on a personal level for me and my family, has diminished the local area to such an extent that we are planning to move away. It makes me sad beyond words that the place my small children loved most in the world was taken away from them. We visited at least twice a week. My two year old will likely not even remember this place which means such a huge amount to me. The site of the zoo should be listed, protected and preserved as a public space, ideally with a focus on wildlife and conservation. It is CRUCIAL that there is an accessible and central outdoor space that celebrates the natural world for future generations of Bristolians. It is unacceptable and untrue to state that something of this nature is not economically viable. This has not been proven. The Wild Place, not even in Bristol, is not an acceptable replacement. It is not accessible for families without a car, for one thing - and how is encouraging car use in line with green principles? The strength of feeling people hold for the zoo and the memories it holds for generations should not be taken lightly - this could be capitalised on and protected rather than desecrated and undermined. Despite the current proposal, there is no guarantee whatsoever that the gardens will remain open to the public in the future. And how likely is this really once it's a private residential community? I urge and beg you to reject this application.	01-Mar-23
747.	O	The loss of Bristol Zoo and the green spaces it offers would be hugely detrimental to the city of Bristol. It has huge historic significance and contains many listed buildings and beautiful spaces and the loss of trees and other plants would be awful. The buildings proposed are not in keeping with the local area and the change of purpose for the site has not been justified. There have many times since the zoo has closed that myself and my children have thought we would have gone to the zoo today had it been open and it is a huge loss to an area which doesn't offer a lot for children in particular.	02-Mar-23
748.	O	This space, without animals, should be for all the people of Bristol to enjoy. The proposed plans do not reflect this ethos. Luxury housing is not an appropriate plan for this space. Moreover, the cutting down of so so many trees would be so damaging. Support heritage and history for all of Bristol to enjoy. Rather than financial wealth for a few. There are so few chances to save local hertigate sites, save this space for the future generations.	02-Mar-23

749.	O	I object to the overall design of these buildings and the loss of landscape. When I read the arbculturalists report on the trees showing the shading pattern of the buildings, how mich disruption the buried utilities causes to roots, it seemed clear that the proposed structures were not compatible with the existing plants survival and an unacceptable number of mature trees would be moved or sacrificed. How can this be acceptable in a city ambitious to address climate change? I am sympathetic to the housing needs of Bristol residents but these are not the houses needed surely? Please hold back and reconsider what is being proposed here, who is benefiting and whether the grant of planning permission is in the interest of the constituents who deserve Council support or those who already have priveledge and support, and finally if this development is in any way aligned with this charities mission. Thank you	02-Mar-23
750.	O		03-Mar-23
751.	O	I have lived in Bristol for 60 years and was a frequent visitor to the zoo with my children. They now bring their children to the zoo so the site is important to us all. I accept that the zoo wants to remove the animals, but surely this space could be kept as a public amenity somehow. I am very sad to see the proposal is to simply build over the area. Surely Bristol could do something more imaginative than this. The visual impact of the proposed buildings will very much detract from the surrounding area in this historic part of the city. All those visitors, many from overseas, who come to visit the suspension bridge near by will see just a few dominating and out of keeping buildings. Something which adds to the area, which benefits many more people than could live in the proposed buildings, would surely encourage our international visitors to keep visiting and help keep Bristol as a key city, not 'just another city'. I strongly object to the proposal. It is out of keeping, out of scale and is inappropriate exploitation of a unique asset.	03-Mar-23
752.	O	I have lived in Bristol for 60 years and was a frequent visitor to the zoo with my children. They now bring their children to the zoo so the site is important to us all. I accept that the zoo wants to remove the animals, but surely this space could be kept as a public amenity somehow. I am very sad to see the proposal is to simply build over the area. Surely Bristol could do something more imaginative than this. The visual impact of the proposed buildings will very much detract from the surrounding area in this historic part of the city. All those visitors, many from overseas, who come to visit the suspension bridge near by will see just a few dominating and out of keeping buildings. Something which adds to the area, which benefits many more people than could live in the proposed buildings, would surely encourage our international visitors to keep visiting and help keep Bristol as a key city, not 'just another city'. I strongly object to the proposal. It is out of keeping, out of scale and is inappropriate exploitation of a unique asset.	03-Mar-23
753.	O		03-Mar-23

754. O	<p>Before moving to Bristol 39 years ago, a yearly visit o Bristol and friends always included a visit to Bristol Zoo, and we have continued that practice of taking visitors. It has been such an important part of our life here, and for those of countless others. The queues of families waiting for entry in the summer are testament to this. It would seem a cynical financial land grab to send the animals to other zoos, and to replace with large gated-entry housing and parking for 120 cars; to trash those beautiful gardens, an obscenity. This land is a Bristol gem and should remain intact and returned to what so many of us know as a financially successful centre of animal conservation, enabling future generations to enjoy and perhaps unknowingly to be educated, or preserved and developed as a Botanical Garden to be enjoyed by all. The zoo gardens and several defined buildings are categorised as Heritage Assets. I draw attention to Policy BCS22 from Bristol Development Framework Core Strategy and urge you to put Bristol in charge, as the Trustees have clearly abdicated responsibility, and state a position regarding this, or any further private housing proposals on the land. "Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including: - Scheduled ancient monuments; - Historic buildings both nationally and locally listed; - Historic parks and gardens both nationally and locally listed; - Conservation areas; - Archaeological remains" Policy BCS22, any development proposals on the zoo's site should safeguard or enhance the heritage assets and the character and setting of that area of acknowledged importance. Plan Policy DM31 "development in their vicinity, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings</p>	03-Mar-23
755. O	<p>I have lived in Bristol for 60 years and was a frequent visitor to the zoo with my children. They now bring their children to the zoo so the site is important to us all. I accept that the zoo wants to remove the animals, but surely this space could be kept as a public amenity somehow. I am very sad to see the proposal is to simply build over the area. Surely Bristol could do something more imaginative than this. The visual impact of the proposed buildings will very much detract from the surrounding area in this historic part of the city. All those visitors, many from overseas, who come to visit the suspension bridge near by will see just a few dominating and out of keeping buildings. Something which adds to the area, which benefits many more people than could live in the proposed buildings, would surely encourage our international visitors to keep visiting and help keep Bristol as a key city, not 'just another city'. I strongly object to the proposal. It is out of keeping, out of scale and is inappropriate exploitation of a unique asset.</p>	03-Mar-23

756. O	<p>I have lived in Bristol for 60 years and was a frequent visitor to the zoo with my children. They now bring their children to the zoo so the site is important to us all. I accept that the zoo wants to remove the animals, but surely this space could be kept as a public amenity somehow. I am very sad to see the proposal is to simply build over the area. Surely Bristol could do something more imaginative than this. The visual impact of the proposed buildings will very much detract from the surrounding area in this historic part of the city. All those visitors, many from overseas, who come to visit the suspension bridge near by will see just a few dominating and out of keeping buildings. Something which adds to the area, which benefits many more people than could live in the proposed buildings, would surely encourage our international visitors to keep visiting and help keep Bristol as a key city, not 'just another city'. I strongly object to the proposal. It is out of keeping, out of scale and is inappropriate exploitation of a unique asset.</p>	03-Mar-23
757. O	<p>I now spend half my time in .Bristol where my partner lives and have loved the city ever since being a student at the university.The proposed development will have a detrimental effect on this historical and famous area. It certainly will not "improve and enhance." The visual impact be out of keeping with the surrounding buildings. The increase in traffic, without the existing zoo carpark, will be detrimental. The zoo site is nationally famous and the reputation of the city is bound in with historical things like this. It is as iconic in its way as the suspension bridge. I accept that the zoo has/will move away, but just to remove any evidence by sticking up high-rise flats is philistine. Why ruin such a reputation for the benefit of the developer alone? Young people want to come and live and work in Bristol because of its reputation, don't destroy that. The development itself will not alleviate the housing shortage, these dwellings will be for the rich. What about the not-so- rich who will lose a child friendly area which is within walking district of Clifton? This is a crass, insesitive proposal when so many more appropriate solutions have been made.</p>	03-Mar-23
758. O	<p>Too many mature trees will be removed to allow for extensive building, according to the plans submitted. A third of the trees in the site will be removed if the current plans are approved, destroying what is at present an oasis of greenery and tranquility within a busy city. We need more trees to contribute to the clean air zones of our city, not less. Removing so many trees goes against all the plans to improve air quality locally and fighting climate change. Building in the way it has been proposed would be a great loss of a public amenity at a time when there is a strong movement worldwide to improve access to green spaces to encourage people to be more active outdoors. The development plans shows that the blocks of apartments are too large and blank in architectural value, completely out of character with the surrounding buildings. The planned high density building is not appropriate for a conservation area with too many apartments being squeezed in inappropriately to this historic site. I object in the strongest terms to this application and ask for this application to be rejected. Thank you.</p>	04-Mar-23

759. O	<p>The plans show that too many mature trees will be removed to allow for extensive residential building of 196 units, according to the current submission. A third of the trees in the site will be removed if the current plans are approved, destroying what is at present an oasis of greenery and tranquility within a busy city. We need more trees to contribute to the clean air zones of our city, not less. Removing so many trees goes against all the plans to improve air quality locally and fighting climate change, as well as destroying a renowned garden. Building in the way it has been proposed would be a great loss of a public amenity at a time when there is a strong movement worldwide to improve access to green spaces to encourage people to be more active outdoors. The development plans shows that the blocks of apartments are far too large and lacking in architectural value, completely out of character with the surrounding buildings. The planned high density building is not appropriate for a conservation area with too many residences being squeezed in to this historic site. It is inappropriate. I object in the strongest terms to this application and ask for this application to be rejected. Thank you.</p>	04-Mar-23
760. O	<p>Bristol Zoo has not made a case for relocation. The proposed development is completely inappropriate to Clifton Conservation Area. The proposed buildings are overbearing, too dense and would completely change the nature of the area. As in other, similar developments, the stated inclusion of accessibility to the public after development, is likely to disappear, and the community created would be likely to be gated.</p>	04-Mar-23
761. O	<p>There are a multitude of reasons why I object to the proposed development. IT IS BRISTOL ZOO. It has been enjoyed by the people of this city for hundreds of years. When it sells the site, the zoo cannot guarantee the public access to the gardens it talks of. This is greenwash. We will lose a public amenity that has huge communal value. The proposed redevelopment is ugly in the extreme and is completely driven by the desire to maximise profit. It is beyond Ironic that Bristol Zoo, a conservation charity is putting forward a proposal that will hugely damage these unique 12-acre gardens. I urge the council to reject this plan and give the time needed to seek a more sympathetic and appropriate future for this site.</p>	04-Mar-23



762. O	<p>I wish to object to this planning proposal for the following reasons: 1. Under National Planning Policy Framework 2021, the site falls under the category of Heritage asset (NPPF, 16 [Conserving and enhancing the historic environment] para 189) since it is of significant "local historic value", the gardens having been continuously curated since 1836. As NPPF states, such an asset is "an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations." Construction of a multistorey estate on this special site would contravene this area of national policy. 2. Under Bristol City Council's own Conservation and the Historic Environment Policy BCS22 from Bristol Development Framework Core Strategy, "Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including: - ... - Historic buildings both nationally and locally listed; - Historic parks and gardens both nationally and locally listed; - Conservation areas; - ..." The site of the proposed development contains multiple protected heritage assets (The Zoo's Monkey Temple, and Eagle Aviary, Bear Pit (now Aquarium); the main entrance building, the Giraffe (now Gorilla) House building and south entrance gates, all Grade II listed). In accordance with Policy BCS22, any development proposals on the zoo's site should "safeguard or enhance the heritage assets and the character and setting of these nationally recognised assets". It is highly questionable whether a high-density multistorey estate constructed in the close vicinity to these assets would align with this Policy. The zoo gardens are an irreplaceable long-cultivated part of Bristol's identity. Under the Bristol Local Plan document Site Allocations and Development Management Policies Policy DM31 (Heritage Assets) any heritage asset is defined as "a finite non-renewable resource that can often be irreparably damaged by insensitive development"; Moreover the Policy states that: - "Great weight is given to the conservation of designated heritage assets.", and that - "development in their vicinity, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings". The nature and massing of a multistorey estate development on this site will be overbearing, with high-level adverse impact on the gardens' setting and amenity value. Moreover, the close proximity of the proposed development will not conserve the character of the listed assets in any way. The proposal is therefore at clear odds with Policy DM31. Additionally, the proposed architecture would have significant impact on the conservation area where the site is located. Per Policy DM31 "Development within or which would affect the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance." The proposed slab-type architecture, massing and height would in no way align with Policy DM31. Aside from compliance with local and national policy, the scale of the proposed development would have significant adverse impact on the local urban infrastructure, which has not evolved to accommodate such housing density or mass. Development of this scale would necessitate considerable additional expenditure on local infrastructure (traffic controls, road strengthening / widening etc) to ensure that all residents and visitors to the gardens under the proposed development's housing and leisure intentions could safely enter and exit the site. For the above reasons I strongly object to this development proposal and request that this planning application be refused.</p>	05-Mar-23
--------	---	-----------

763. O	Harm to overall historic interest and significance of site. Loss of Communal Value. Harm to listed buildings. Social & material harm unjustified. Need for change of use not proven. Loss of public amenity. Loss of landscape.	06-Mar-23
764. O	Under National Planning Policy Framework 2021, the site falls under the category of Heritage asset (NPPF, 16 [Conserving and enhancing the historic environment] para 189) since it is of significant "local historic value", the gardens having been continuously curated since 1836. As NPPR states, such an asset is "an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations." Construction of a multistorey estate on this special site would contravene this area of national policy. Also protected under Bristol City Council's own Conservation and the Historic Environment Policy BCS22 .	06-Mar-23
765. O	I am quite frankly totally gobsmacked that the Bristol Zoo trustees are seeking to sell the Clifton site of Bristol Zoological Gardens. The clue is in the whole name - it is Bristol Zoo Gardens. To sell what has for almost 200 years been a basic part of the fabric and heritage of the City of Bristol is nothing less than cultural vandalism. Countless generations of Bristolians and their families have spent thousands of hours of enjoyment and fun at the zoo and its gardens. Bristol Zoo Gardens has provided relief and environmental escape for Bristolians wishing to enjoy a unique park on the edge of the beautiful Avon Gorge, especially for those without the means to travel out of the city to other places of leisure. The trustees make the specious argument that it is necessary to sell the Clifton site in order for the zoo to survive economically. They highlight the unusual loss which the zoo made in 2021 in particular as justification for the need to sell Bristol Zoo Gardens, but this is completely disingenuous because that was during the height of the coronavirus pandemic when the zoo was legally forced to be closed, and people had to stay at home. It beggars belief that the trustees use the loss made during that year as a primary reason for selling the site. I'm afraid to say that this smacks of economic opportunism on the part of the trustees as a way to make a lot of money, regardless of the consequences for the wellbeing, history and culture of Bristol. Bristol Zoo is the 5th oldest zoo in the world, and is internationally renowned. It is also much loved by Bristolians. The gardens themselves have won many awards and have matured over the course of 186 years and there are many plants which are unusual and unique and should be highly protected. I have been a member of Bristol zoo for over 40 years. My children are all now in their thirties, but I had been taking them to the zoo since they were babies. They had many happy times there as child members, including things like birthday parties and picnics on the lawn in the summer. I am afraid I have no respect for people who seek to destroy so much of Bristol's history. What is the urgency? Thousands of people (except during the pandemic) would come every year to enjoy Bristol zoo and its gardens. The Clifton zoo has been very popular not only with Bristolians, but people from around the region, including South Wales, and from further afield. Such an attraction has poured millions of pounds into the economy of Bristol for decades. Selling Bristol zoo gardens will lose the City of Bristol all that economic benefit. All for the sake of short term gain. It is yet another example of selling off the family silver. And the actual reality is that Bristol zoo has always been a major economic driver for the city, whilst business interests have contemptuously seized the opportunity of the forced coronavirus pandemic closure during one year to justify selling such a unique and integral part of Bristol's attraction and culture over 186	06-Mar-23

	<p>years. The Wildplace Project will never come close to providing the same benefits to the city as Bristol Zoo Gardens, and being sited out of the city means that to travel there will mean more car use; but mostly it will mean a serious loss of income for the Zoo and Bristol because the number of visitors will decline dramatically from the numbers who visited the Clifton site. I used to go almost weekly to the zoo gardens. I went recently to the Wildplace Project and it was a sad experience - hardly anything of interest, no gardens, and almost nobody there. As someone without a car, it holds no attraction for me to make a special journey, whereas I could walk to the Clifton site in about 30 minutes - a good walk for me, and good for my health. And as for a so-called improvement for the animals: I was shocked that the giraffe house for example was tiny - no bigger than the old iconic giraffe house at the Clifton site. After over 40 years I shall be cancelling my membership and I am sure that I will not be alone in doing so. The permanent loss of both culture and income will be huge.</p>	
--	---	--

766. O	<p>There is no doubt that the closure of Bristol Zoo Gardens would be absolutely wrong. It is a national treasure and a safe, green space for the people of Bristol and beyond to learn about wildlife and enjoy the outdoors. As a GP in Bristol and mother of three Bristol Zoo lovers, I have multiple concerns regarding this proposal, which I will summarise: 1. It is an environmental disaster. The proposals to remove 42.5% of the trees, as well as other mature gardens tended to for over 180 years, to be replaced by apartment blocks of up to six storeys is disgraceful. If we all behaved in a similar way to this so-called 'education and conservation charity', global temperatures would soar and air quality would be dire. There are already 28,000-36,000 deaths in the UK every year due to human made air pollution (<a href="http://www.gov.uk">www.gov.uk</a>) and this development would only worsen this tragic problem. Is this the precedent that we want to set to our children and future generations of Bristolians? Which green space will be next to go? 2. This is an incredibly important and irreplaceable public asset. Bristol Zoo is the 5th oldest zoo in the WORLD and a truly loved public asset. The proposal that the remaining gardens would be open to the public is completely unrealistic. Who will be paying for the upkeep of these gardens? The residents of the new apartments I should think, who will have absolutely no obligation to keep these gardens open to the public. This is an unsustainable idea. 3. This is NOT a solution to Bristol's housing problem. Surely what we need is housing that is affordable to the majority, not the minority? In addition, the number of vacant homes in Bristol is rising (reported as 3765 by the Bristol Post in August 2022 using data from a freedom of information request to Bristol City Council and Action on Empty Homes). If we are to build more homes despite the thousands of homes vacant in the city, wouldn't even the Wild Place site be more appropriate to build on, avoiding the need to destroy one of Bristol's biggest visitor attractions, with a much higher number of visitors annually than the Wild Place? Surely other options should be considered. 4. This is NOT in the best interests of the animals. I was initially led to believe that this may be best for animal welfare, however have since been made aware that only two mammals are being moved to the Wild Place. The others will undergo/ have undergone traumatic journeys to unknown new homes. I'm sure the transportation of these animals, loved and admired by so many at Bristol Zoo, is not a straightforward or painless procedure. In summary, the closure of Bristol Zoo Gardens is bad for the animals, bad for the people (present and future), bad for Bristol, and sets a terrible precedent for protecting the future of our planet and reducing morbidity and mortality due to air pollution. Please make the right decision.</p>	06-Mar-23
767. O	<p>As a Bristol resident I am concerned about the potential loss if public amenity and while a green space is planned, similar projects have resulted in the space being privatised and fenced off. This is a valuable green space and almost half the trees will go resulting in loss of landscape. We will lose a historic garden and a valuable green urban space that supports communities. The zoo and gardens have been a resource for Bristol residents for generations. Have all options really been explored?</p>	06-Mar-23
768. O	<p>I am strongly objecting on the grounds of the loss of a very long standing and cherished Public amenity . Bristol will be a lesser place to live if this development goes ahead.</p>	06-Mar-23

769.	O	Harm to overall historic interest and significance of site. Loss of Communal Value. Harm to listed buildings. Social & material harm unjustified. Need for change of use not proven. Loss of public amenity. Loss of landscape. At a time of difficulty for so many people and when so many public services are being eroded the loss of this public amenity and community centre is an unjustified loss for the people of Bristol.	06-Mar-23
770.	O	As a resident of Clifton I object to this proposal which involves the destruction of many magnificent trees and plants in this historic botanical garden. Some of the trees have been nurtured for over 250 years and are irreplaceable. As a whole the gardens are of great scientific and historic interest and part of Bristol's cultural history which should be preserved for the enjoyment of the public and not cynically destroyed in a scramble for profit.	07-Mar-23
771.	O	I feel that the design and scale is totally inappropriate for our conservation area.	07-Mar-23
772.	O	The Business case for this application to sell the zoo has not convincingly been made. Despite spending excessively on consultants the Zoo management explored none of their suggestions apart from sale. Even if the zoo cannot remain in its present form the gardens do need to remain as a public amenity in much their present form with long term guarantees of status. The Zoo's current proposals involve significant loss of trees and garden space while the building proposals are aesthetically jarring in relation to the existing buildings and the location of the site. The Zoo and Gardens have been a valuable and popular resource for locals and tourists for generations, especially for children, and would represent a great loss were they both to go in their present form.	07-Mar-23
773.	O	As the Zoo planning team have not allowed access to their own models, we are having to rely on the images that could best be derived from the Zoo plans. Of course it would be much better if the Zoo planning team did allow access as we all could see what their intentions really are. However, from the best images that can be derived, I am astonished to see how the flats construction are not in keeping at all with the fabulous buildings that are currently in Guthrie Road and on the perimeter of the whole Zoo. They are entirely incongruent with the area in design, scale, mass and form. With the flats being such large blocks these buildings will completely overshadow existing buildings. So we would expect the buildings to be more proportionate and sympathetic to the Clifton area. I dont live in Clifton but it is an area that is frequently visited quite often using the Guthrie Road route. It is currently a very beautiful part of our city and should continue to be but the current design of these buildings will degrade the area so much.	07-Mar-23

774. O	<p>I object to the design of the development and the change in use of the area. This has been an area that the general public have been able to enjoy for years. It is a beautiful space for Bristolians to be able to visit with mature trees and gardens. The downs are close by but this is a totally different type of space and not the same. Mental health is something being held with more regard and importance. Green Social Prescribing is a success in the Bristol are and this is just the type of place that it perfect for helping people suffering with depression etc... For many people living in urban Bristol access such a space by publis transport is of vital importance. The mature trees and gardens should not be ripped up for property development and this should not be a gate community for just the wealthy to visit. This is an local Historic Park &amp; Garden and an Important Open Space Do not let commercial greed destroy and take away this setting for so many people to enjoy. I</p>	07-Mar-23
775. O	<p>It is well known, but little regarded, that there are many disadvantages in preparing design proposals from the metropolis for the genius loci of an historic city in the provinces and this scheme illustrates it very well. . But there is one potential advantage for a metropolitan elite, concernng the provision of private outdoor space, and an exploration of that feature alone will serve to demonstrate how ill-fitting are the proposals for the Bristol Zoo site. London has demonstrated time and again the inability of their architects to design effective, private outdoor spaces for flats, since the first C20 mansion blocks grew balconies. Reduced of late to becoming transparent, wind and rain stricken and offensive of townscape with residents' clutter, such balconies are mostly entirely unsuited to the British climate. Flat-owners have been progressively failed by architects, in even medium-rise blocks. Unfortunately the London architects for the zoo site still fail to grasp these issues. When the designs are coupled with flat roofs and hideously level parapets, one has to start asking questions such as why are the ground- and first-floor flats not given open space on ground level with private stair access, and roof pavilions as climate havens on flat roofs given to second- and third-floor flats, served by private stairs and dumb-waiters? . Such solutions provide ready opportunities to create modelled roof scapes that would respond to listed buildings and the historic streets of Clifton, and the need for a green architecture. Where were such assessments by the client body at concept and by the planners at pre-application stages? . This retired conservation architect accordingly supports the analysis of the project by Downs for People, the objections of the Victorian Society, Bristol CAP, and Avon Gardens Trust. Equally the idea of a virtual zoo is unhelpful.</p>	07-Mar-23

776. O	I object to the current application because :- 1. A large housing development on this site will destroy the special historic nature of the zoo gardens which are a heritage resource and also constitutes a loss of public amenity. 2. This scheme is too dense with overbearing buildings on the perimeter in terms of massing and height and particularly the semicircle of new houses built within the gardens constitutes gross overdevelopment. 3. I welcome free public access to the garden space but this needs to be secured by a legal transfer of ownership of the garden space rather than simply conditioned to ensure it continues in perpetuity.	08-Mar-23
777. O	I object to the current application because :- 1. A large housing development on this site will destroy the special historic nature of the zoo gardens which are a heritage resource and also constitutes a loss of public amenity. 2. This scheme is too dense with overbearing buildings on the perimeter in terms of massing and height and particularly the semicircle of new houses built within the gardens constitutes gross overdevelopment. 3. I welcome free public access to the garden space but this needs to be secured by a legal transfer of ownership of the garden space rather than simply conditioned to ensure it continues in perpetuity.	08-Mar-23
778. O	I strongly object to the plans for the closure and redevelopment of Bristol Zoo Gardens. As a close neighbour, I am deeply concerned at the loss of a valuable heritage, cultural, environmental and social asset, without what appears to be due consideration on the part of the zoo for the ecological and social damage that the closure and redevelopment of the site will have or any attempts to save the zoo or consider alternatives to redevelopment. The zoo is an intangible cultural asset - as the 5th oldest zoo in the world it has a unique place in the social history of the world and the development of zoos as a place of education, conservation and entertainment. As the home for many years of Alfred the Gorilla, not to mention the various significant figures who helped found and support the zoo, it has a unique place in Bristol's history and as a place of enjoyment, rest, education and repose it has an important part in many resident's personal histories. The pandemic showed us the vital importance to social and mental health of having green spaces to visit and enjoy - the zoo gardens has provided a welcome green space for me, and many other Bristol residents and families to visit and relax in, secure in the knowledge that the space was car free, enclosed and safe from dog walkers, scooters, bikes and the numerous other dangers to pedestrians and those trying to enjoy the outdoors. At the same time, the ecological and climate crisis (which Bristol council itself has acknowledged) has emphasised the importance of parks, gardens and green spaces as lungs for our cities and ways of mitigating urban flooding - partially caused by uncontrolled development and the replacement of permeable soil and trees with impermeable tarmac. The plans for redevelopment have the potential to cause immense social, environmental and even physical harm. The redevelopment will remove a green space for citizens to enjoy (because the plans will not only decimate the available green space but also have no mechanism for ensuring the continued public access to what little open space remains). The redevelopment intends to remove vast quantities of the existing green space and almost half of the trees in the zoo site - many of which may be unique or of particular age and heritage deserving of protection - causing immense damage to the ecosystems that exist and flourish in the gardens. Not only will the environment of the zoo gardens be damaged by the redevelopment	08-Mar-23

	<p>(at a time when the zoo itself is exhorting its supporters to join its campaign to protect and support local ecosystems and the environment) but the local environment will be harmed - both by the environmental damage of redevelopment of what is essentially a green site of lawns, gardens, trees and ecosystems; by the environmental damage associated with building and by the environmental damage of creating a housing development and associated residential traffic in an already high traffic residential area. For the entire length of its nearly two century history, the zoo site has been closed to cars, safe for pedestrians and not contributing to an atmospheric crisis. Under the plans for redevelopment this will change. Car parking is incorporated into the zoo's plans so for the first time in its history, cars will be allowed on the zoo site, adding to the traffic congestion in the local area, and causing potential traffic danger to existing residents, the school children who attend Clifton College (which borders the zoo on three sides of the site and whose ages range from kindergarten to secondary school age) and the public accessing the redeveloped site - particularly when there are minimal efforts at ensuring the safety of the different users - especially pedestrians, those with impaired vision or mobility or those with children - whose access to the site will be hampered by no attempts to control the use of cars, bikes or scooters through the site. The plans as they are developed show no regard to the specific historical or cultural importance of the site nor to the very distinct character of the local area. There are no assurances that the listed heritage assets within the zoo site will be kept, maintained or even incorporated into the areas to be accessible by the public (even though continued public access to the site after redevelopment is by no means guaranteed or guaranteeable) and the plans for the housing areas are too massive and completely out of scale and character with the surrounding buildings and housings, all of which is sufficiently distinctive to have created a local conservation area. In summary, I feel that the zoo has failed to explore alternatives for closure and that the plans for the redevelopment of the site pose significant environmental, social, cultural, historic and completely unjustified harm and represent the great and grave loss of a site of significant communal value.</p>	
--	--	--



779. O	<p>Whatever your opinion is about zoos, this application is about the land and its future. If this application is successful it will never be possible to protect what is wonderful about this small corner of the city. The plans submitted are highly unlikely to represent in any way what is finally permitted. That Group's proposals and their reiterative amendments for the old W.H.Smiths site on Clifton Down Road should be a warning, bearing little resemblance to the original permission given. As proposed, the haven of these historic gardens are effectively destroyed. Consider the probable on-site vehicles - residents' cars, taxis, delivery trucks, trades vans - as you see in any street in the city. The denser the housing the greater the number of vehicles sharing space with pedestrians. And there is no guarantee that a future developer or the residents wouldn't just turn it into a private gated community. It would be a lost public amenity. I am very concerned about the loss of trees likely to follow any development of this site. It seems to be very easy to find reasons to remove trees that are supposedly protected, however precious the species or their amenity value. How many of these new dwellings will contribute to resolving the city's housing crisis? And how many are likely to be second homes or worse still bought for Airbnb or similar? Clifton is full of this and getting worse. It's a lucrative business and ludicrous to think this would not be a prime target for such ventures. If the council were to put its own social housing on the site, not densely packed and at affordable rents for homeless families it might be a supportable proposition. As it is this smacks of poor management leading to an unimaginative money grubbing scheme. Where is the evidence that such a drastic change of use is necessary? Is this a proper use of the assets of a historic charity based on conservation? There is no excuse for the bland and ugly proposed flats. Where is the reference to local architecture? And why are they so high as to distort the scale of nearby buildings? They are clearly designed to cram in as many "units" as possible for the greatest monetary return. This is a Conservation Area with a large proportion of listed buildings some of which are on this site. Does Bristol City Council really want to share the opprobrium that will follow from its complicity in the destruction of these beautiful gardens for such a crass development?</p>	08-Mar-23
780. O	<p>The gardens are an important asset to Bristol's reputation as a green city and should not be used for private benefit. They should be kept as a communal area for the residents of Bristol and an attraction for visitors from elsewhere. It is important to maintain every green space we have both for our own mental and physical health and the wider world.</p>	08-Mar-23
781. O	<p>I am dismayed at the lack of protection for Bristol Zoo Gardens. It is a special place for Bristol citizens - and for tourists. It is unique in being close to the city. It is accessible to the disabled, has listed buildings, trees, gardens and has an important research and educational role. The case for replacing this historical landmark with housing suggests that those promoting such a scheme have been economical with the truth. The Council has a duty of care to preserve and save the zoo from irreplaceable loss.</p>	08-Mar-23

782. O	<p>I strongly object to the plans for the closure and redevelopment of Bristol Zoo Gardens. As a close neighbour, I am deeply concerned at the loss of a valuable heritage, cultural, environmental and social asset, without what appears to be due consideration on the part of the zoo for the ecological and social damage that the closure and redevelopment of the site will have or any attempts to save the zoo or consider alternatives to redevelopment. The zoo is an intangible cultural asset - as the 5th oldest zoo in the world it has a unique place in the social history of the world and the development of zoos as a place of education, conservation and entertainment. As the home for many years of Alfred the Gorilla, not to mention the various significant figures who helped found and support the zoo, it has a unique place in Bristol's history and as a place of enjoyment, rest, education and repose it has an important part in many resident's personal histories. The pandemic showed us the vital importance to social and mental health of having green spaces to visit and enjoy - the zoo gardens has provided a welcome green space for me, and many other Bristol residents and families to visit and relax in, secure in the knowledge that the space was car free, enclosed and safe from dog walkers, scooters, bikes and the numerous other dangers to pedestrians and those trying to enjoy the outdoors. At the same time, the ecological and climate crisis (which Bristol council itself has acknowledged) has emphasised the importance of parks, gardens and green spaces as lungs for our cities and ways of mitigating urban flooding - partially caused by uncontrolled development and the replacement of permeable soil and trees with impermeable tarmac. The plans for redevelopment have the potential to cause immense social, environmental and even physical harm. The redevelopment will remove a green space for citizens to enjoy (because the plans will not only decimate the available green space but also have no mechanism for ensuring the continued public access to what little open space remains). The redevelopment intends to remove vast quantities of the existing green space and almost half of the trees in the zoo site - many of which may be unique or of particular age and heritage deserving of protection - causing immense damage to the ecosystems that exist and flourish in the gardens. Not only will the environment of the zoo gardens be damaged by the redevelopment (at a time when the zoo itself is exhorting its supporters to join its campaign to protect and support local ecosystems and the environment) but the local environment will be harmed - both by the environmental damage of redevelopment of what is essentially a green site of lawns, gardens, trees and ecosystems; by the environmental damage associated with building and by the environmental damage of creating a housing development and associated residential traffic in an already high traffic residential area. For the entire length of its nearly two century history, the zoo site has been closed to cars, safe for pedestrians and not contributing to an atmospheric crisis. Under the plans for redevelopment this will change. Car parking is incorporated into the zoo's plans so for the first time in its history, cars will be allowed on the zoo site, adding to the traffic congestion in the local area, and causing potential traffic danger to existing residents, the school children who attend Clifton College (which borders the zoo on three sides of the site and whose ages range from kindergarten to secondary school age) and the public accessing the redeveloped site - particularly when there are minimal efforts at ensuring the safety of the different users - especially pedestrians, those with impaired vision or mobility or those with children - whose access to the site will be hampered by no attempts to control the use of cars, bikes or scooters through the site. The plans as they are developed show no regard to the specific historical or cultural importance of the site nor to the very distinct</p>	08-Mar-23
--------	--	-----------

	<p>character of the local area. There are no assurances that the listed heritage assets within the zoo site will be kept, maintained or even incorporated into the areas to be accessible by the public (even though continued public access to the site after redevelopment is by no means guaranteed or guaranteeable) and the plans for the housing areas are too massive and completely out of scale and character with the surrounding buildings and housings, all of which is sufficiently distinctive to have created a local conservation area. In summary, I feel that the zoo has failed to explore alternatives for closure and that the plans for the redevelopment of the site pose significant environmental, social, cultural, historic and completely unjustified harm and represent the great and grave loss of a site of significant communal value.</p>		
783.	O	<p>What a shame the proposed buildings are so huge - totally out of proportion and will change the area, not for the better. The plans I have seen look more in line with ubiquitous office blocks/student accommodation rather than fitting in/blending in with the area.</p>	08-Mar-23
784.	O	<p>I object to the current application because :- 1. A large housing development on this site will destroy the special historic nature of the zoo gardens which are a heritage resource and also constitutes a loss of public amenity. 2. This scheme is too dense with overbearing buildings on the perimeter in terms of massing and height and particularly the semicircle of new houses built within the gardens constitutes gross overdevelopment. 3. I welcome free public access to the garden space but this needs to be secured by a legal transfer of ownership of the garden space rather than simply conditioned to ensure it continues in perpetuity.</p>	08-Mar-23

785.	O	I object to the current application because :- 1. A large housing development on this site will destroy the special historic nature of the zoo gardens which are a heritage resource and also constitutes a loss of public amenity. 2. This scheme is too dense with overbearing buildings on the perimeter in terms of massing and height and particularly the semicircle of new houses built within the gardens constitutes gross overdevelopment. 3. I welcome free public access to the garden space but this needs to be secured by a legal transfer of ownership of the garden space rather than simply conditioned to ensure it continues in perpetuity.	08-Mar-23
786.	O	The Bristol Zoo Gardens have taken many years to mature. There are interesting and beautiful trees which would be lost if this development were to go ahead. The botanical variety of this space would be gone forever. The green space proposed would be smaller and there is a likelihood that over time public access may be lost. The proposed buildings are out of keeping with the area .	08-Mar-23
787.	O	The context of this planning proposal arises with the charity's decision-making and the push to abandon the zoo's main site in favour of a plan for building expensive homes for humans with a view to using the capital resulting from this to build animal homes elsewhere. The homes in the Wildplace outpost are likely to cost a great deal more than the funds that may be available in theory, take a great deal longer to build and may never actually be built. No full options appraisal of other possibilities than closure appear to have taken place, nor has there been adequate public consultation and engagement on that or on the building plans for the Clifton site. At the limited meetings that I have attended following the 'fait accompli' there was minimal opportunity to really discuss the key environmental and conservation issues, the loss of amenities, appropriateness of the development, and who or what profits from this. The animals are last in line, followed by the public and visitors for whom this was a valuable public benefit as required by charitable status. The loss of such a valued amenity and asset within the city of Bristol for families, schools and the wider population is implied by the possible acceptance of this proposed 'planned' development currently under discussion. The evidence available does not support the argument that conservation and high quality environmental management at a local and national level will be enhanced, and there is little guarantee that there will be wildlife benefits. An independent assessment and review is clearly needed with consultation on a broad front and a delay in giving planning permission would facilitate this critical step.	09-Mar-23
788.	O	I am a Clifton resident and have been for 15 years. The loss of Bristol Zoo as a public amenity and outdoor community space is huge. We need more of these spaces, not less! Loss of gardens, trees, play spaces - where children can play safely and educationally - the benefit of this space for children's development is immeasurable.	09-Mar-23

789. O	<p>The loss of this public space is going to have a huge knock on effect for people of all ages. The gardens are accessible (both within the space and by public transport) We have an opportunity to reach a number of the targets in the one city plan such as high quality green spaces for all and most importantly move us towards reaching our own promise of managing 30% of pur land for nature. There are so many new developments in Bristol... alongside the loss of facilities and decline in the quality of our green spaces. We are a green capital...let's be brave and preserve this space for people and nature rather than build YET ANOTHER exclusive housing development.</p>	09-Mar-23
790. O	<p>I am appalled at the proposed plans for overbearing and totally unsympathetic flats bordering the Bristol Zoo site. This is a Conservation Area, on a main route into Bristol so highly visible to many people. The proposed overbearing flats will have a highly deleterious affect on neighbouring properties including listed buildings, (such as the chapel) belonging to Clifton College.. Neighbouring Victorian properties such as Northcote Road, also in the conservation area will have their views blighted by such appallingly ill-conceived properties. As someone who lives 5 minutes from the Zoo site I very strongly object to these planning proposals for a gated community largely consisting of very expensive flats and the blighting of a much loved and very important and unique area of the city..</p>	09-Mar-23

791. O	<p>The Clifton zoo site is a unique heritage of trees and flowers managed and developed over 186 years to delight the residents of Bristol, and welcome visitors from all over the world and by so doing support the economy of Bristol. It has been a centre of education for enabling children and adults to learn about animals and ways to conserve and support them over the world. It is very much loved by all who have experienced it in so many different ways and it will be a tragedy for Bristol if it were to lose it for a rather mediocre housing development. The decision that the Bristol Zoological Society has made to close the Clifton Zoo and move all operations to the Cribbs Causeway Wild place site without proper consultation with the users of the zoo and with zoo and business people who have appropriate knowledge is an issue to be undertaken as soon as possible. The Bristol Zoological Society shareholders and trustees structure and mode of operation needs to be updated. It is not too late. In my opinion the sale of the Clifton site will not raise enough money to make Wild Place a successful single zoo for Bristol, whereas having both sites will be very attractive and will bring people to Bristol. The Clifton site is financially viable as a zoo albeit needing new strategic plan organized for animals who will enjoy being there. This proposed development of the Clifton zoo site being considered here will involve the destruction of a large part of the garden and the around 40% of the trees. How can this be defended when we need established trees and plants to help us reduce our carbon footplate, and gardens give much wellbeing and enjoyment to both adults and children. The listed buildings will no longer be available but converted into flats and any part of the garden site not built on by the development will have no security to remain well tended with public access and will have cars and it will not give the same sense of wellbeing that the beautiful Clifton Zoo garden does. To summarize The Clifton Zoo Site is a beautiful mature and unique place which has been enjoyed by millions of people for at least 186 years. All the evidence shows that it would be viable if it was developed appropriately into a better zoo. It would be a tragedy to lose it for the development of housing which would not be affordable for those who most need housing in Bristol.</p>	10-Mar-23
792. O	<p>A Green Argument for Retaining Bristol Zoo in Bristol Loss of Communal Value: For many years Bristol Zoo has provided entertainment and education to families in Bristol. They can get there by bus with a bus to the Zoo from the Temple Meads via the centre. To combat Global Warming we need to travel less and use Public Transport when we do. People say that we can solve the transport problem by going electric; but there is not enough copper in the world to do this. Bristol Zoo provides 12 acres of a green oasis. The proposed development is for expensive housing and lots of cars. The proposal is to cut down almost half the trees on the site. They have already cut down most of a 100 year old tree. Although the proposal suggest that part of the site will be open to the public, that would require public money if there is no zoo garden to attract paying contributors. Is the Council going to pay? Need to Change not Proven: Evidence from looking at the zoo accounts over the last decade; does not suggest that the Zoo gardens could not be self sustaining. They will need to change and clearly the current management do not wish to do so; however there is a significant group of influential people who would like the opportunity to develop and maintain this historic and valuable resource for the people of Bristol. Please do not approve the change of use for the Zoo Gardens and allow time for a plan for keeping the Zoo Gardens to be created.</p>	10-Mar-23

793.	O	This planning is alarming!!!! to Demolish this wonderful Zoo after 185yrs with all its Heritage You must Reconsider your plans once this site is lost you can never replace it no matter what you do So much of our country's fantastic architecture is being bulldozed away	10-Mar-23
794.	O	As a Bristol resident I am horrified that the Bristol Zoo Gardens could become a housing development. Ok so perhaps it is a brown site - ripe for redevelopment. It is also a hugely historic asset to the City of Bristol attracting thousands of visitors every year, providing education, leisure, beauty, interest and so much more to many. The gardens alone warrant botanical special interest. It has been providing this for years and the proposed development could see this jewel lost forever.	10-Mar-23
795.	O	I urge BCC not to allow planning permission for the construction of luxury housing in an already wealthy area of Bristol. The Site could no longer be considered an amenity for the people of Bristol and the proposed development would enhance no-one except for the developers. The Bristol Zoological society should be asked to invite creative and sustainable ideas for usage of the site internationally.	10-Mar-23
796.	O	I am against the proposed redevelopment of the site. The blocks of flats proposed are tall, require removal of many established trees, will increase traffic (not just residents' cars but also deliveries), impact negatively on the safety of school children around the site as well as runners and cyclists and leave the surviving garden part as an enclosed yard and not a genuinely open space. Even with a proportion of affordable housing, market forces mean this is not going to meet the needs of low income families that cannot access decent housing and is, to my mind, a smokescreen to mask a commercial development that is out of character with the nature of the Downs. It's not green and not in the spirit of the site or the conservation area as a whole. Neither does it address genuine housing needs for the city.	11-Mar-23
797.	O	I am appalled by this proposed housing development at Bristol Zoo Gardens. It is simply horrendous. I cannot believe that anyone thinks it is suitable in any shape or form for this beautiful conservation area that is so special to Bristol. The buildings appear like huge blocks of white concrete which will dominate and totally overwhelm their surroundings. They will be seen for miles around as a blot on the landscape. They have nothing in keeping with the historical Victorian buildings that are the character of Clifton. Added to this is the question of the sustainability of 196 dwellings in a small conservation area which will be mostly unaffordable for the people who really need housing. So developers are out to make money and squeeze in as many houses as possible without any regard for the people who will live or who already live there and the inevitable irreversible damage to the environment that such an unsympathetic development will cause. To destroy the legacy of the world famous Bristol Zoo in this way is a tragedy. If this development is permitted to go ahead then it will be seen as something akin to the concrete blocks built in the 1960s. People in years to come will look at it with horror and bewilderment and say "how could this monstrosity ever have been allowed?"	11-Mar-23

798.	O	Don't lose the heritage site. Save the site as gardens	11-Mar-23
799.	O	The proposed development of the site of Bristol Zoo fails to give sufficient weight to the historic and cultural significance of the site and its buildings. These are part of Bristol's heritage and could be redeveloped in a way that would respect the history of site, preserve its function as a tourist attraction and therefore boost tourism which would benefit all Bristol citizens. I feel strongly that alternative proposed developments that would preserve the zoo's heritage for the benefit and profit of the people of Bristol have not been sufficiently explored. The planning committee should reject the current proposal on the grounds that it does not protect Bristol's cultural heritage and the historical and architectural importance of the site. The proposed development is wholly inappropriate and would have a detrimental economic impact on the city as a whole as well as destroying an important part of the city's cultural and social history.	11-Mar-23
800.	O	I object to the Zoo's planning application on the following grounds: 1. The Zoo is a significant part of Bristol's history and is therefore of heritage value. 2. Long established trees and plants will be lost from an area that is listed as a local Historic Park & Garden. 3. The garden is a valuable green urban space that gives pleasure to hundreds of thousands of visitors every year. 4. The site is within easy reach for Bristolians, unlike the Wild Place site, and is a popular place for family events both large and small. 5. Listed buildings on the site will be lost or become inaccessible. 6. The proposed apartment buildings are ugly and out of keeping with the surrounding area.	12-Mar-23
801.	O	The surrounding buildings are in Pentland red stone or Bath stone so white concrete tall structures are totally out of sympathy with those existing Victorian structures. The proposed structures are also too tall. They should not exceed the height of the surrounding wall of the perimeter so that they blend in with the neighbouring properties. Further information on the landscaping of the gardens and ponds should be given and details of the proportion of social housing identified, This is a very sensitive site which does not lend itself to white tower blocks of no character which dwarf the surrounding buildings, roads and pavements. I strongly object to the submitted plans.	12-Mar-23
802.	O	I object on the grounds: 1) lost communal value, 2) lost historic interest, 3) opposite of what the climate emergency demands, massive increase in embodied and ongoing emissions, and reduce educational engagement opportunities. We are all so lucky to have this historic civic institution, founded and guarded by some of the Bristol great and good. I strongly believe they would be horrified, like the vast majority of Bristolians today to see a tiny group of developers try to destroy this. Civic society, through planning decisions, must remove such temptations, by making clear the space must remain fully for public benefit. There is no proven need for change of use. The previous was profitable. It was modernising education and animal welfare. Bristol's BBC and ecological heritage could lead the world in developing virtual and educational city zoos.	12-Mar-23



803. O	As a Bristol resident I am appalled that a city which has been awarded Green Capital status can think of allowing a heritage site, such as Bristol Zoo, which has important scientific value as well as communal value, to be turned over for the building of luxury homes. The botanical significance of the plants and trees in the Zoo Gardens is widely recognised and appreciated not only by Bristolians, but also by visitors from South Wales and the South-West. Many mature trees will be felled as well as long-established herbaceous borders to make space for car-parking and expensive houses. The Zoo gardens have been a much-loved and much-used green public space for almost 200 years, a place also for celebration, weddings and the scattering of ashes, part of the emotional fabric of the city. Change of use is neither called for nor proven, and whereas it might make sense to transfer the animals to a better-equipped site, the proposed financial exploitation of this invaluable inner-city green area for the benefit of a few rich people flies in the face of all our hopes and aims for a better green future for everyone. How can Bristol pride itself on being a sustainable city, the UK's first Cycling City and a former European Green Capital, if it allows its current and future citizens to be deprived of a treasured public amenity with historical significance?	12-Mar-23
804. O	I'm objecting to this planning application on a number of grounds. 1.. Harm to overall historic interest and significance of site. The zoo has been part of Bristol for such a long time, changing it into residential property as this planning application requests would damage the significance of the site. 2. Loss of Communal Value. This is a valuable urban green space that has been enjoyed by people across Bristol for many years. Turning it into residential property will inevitably lose some of this communal value. 3. Loss of public amenity. An ancient green space would be changed, and some of it lost forever. At a time when focus is on the environment this seems unjustified.	12-Mar-23
805. O	1. This site is of historic value to the city of Bristol and as such any new development should continue to be enjoyed by future generations. 2. It is a large part of the environmental landscape in this part of the city and should be protected. 3. It is a site that has been enjoyed by significant numbers of people over the years and not just by a small number of individuals within an exclusive housing scheme. This is unjustified harm to the wider community. 4.The need for more exclusive housing in this part of the city is not proven and as such the change of use is also unproven	12-Mar-23
806. O	The proposed development constitutes a loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller, and may not remain public. It's listed as a local Historic Park & Garden and an Important Open Space.	12-Mar-23

807.	O	One of the reasons that we bought the house that we live in was for the wonderful green spaces of the Downs and the Zoo. My children spent many happy hours in the beautiful gardens there and enjoyed the park as in fact it was the nearest playground to our house. Bristol is woefully endowed with play spaces for children. The proposed building are totally out of proportion with the existing buildings and present a "wall" of flats more in keeping with the centre of the city. The proposed buildings do not offer any architectural merit and do not offer innovative eco credentials that are surely what would be in keeping with such a site. The Zoo gardens contain many listed and historic buildings which must be retained and made available for the community. I do not object to building on the site per se, more the extreme building that is proposed. I feel it is essential to maintain the gardens as a public amenity for the community.	12-Mar-23
808.	O	I object to this application and I am very upset that the proposal has been put forward. The Zoo gardens have been in operation for 186 years and survived countless challenges and changes. They are a fundamental part of Bristol, a hugely loved public amenity and site of historical value. The proposal will result in the loss of this. The business case for the move is not justified. I cannot see that alternatives have been properly explored and the case has not been made that the zoo cannot remain at the current site, evolving to meet the new challenges. I am also very concerned about the loss of green space and well established trees. The loss of so many trees, many decades old, and their replanting with small trees which will take many years to grow to the same age, is not sufficient given the climate and biodiversity challenges Bristol faces.	13-Mar-23
809.	O	For generations of Bristolians, and visitors to the city, Bristol Zoo Gardens has been a much loved and hugely valuable recreational and educational resource, and has become a place of incalculable historic importance. Turning this unique heritage site into a luxury housing development will destroy its cultural value to the local community, and to the city at large. I urge you to reject the current planning application, and to ensure that any future development of the site respects and preserves its history and heritage.	13-Mar-23
810.	O	Bristol Zoo has been open to the public for recreation for 186 years. It an act of vandalism to close it. The proposed buildings are far too big and will detrimentally affect the historic walled estate. The zoo could continue in some form. The housing is for the wealthy , we need access for all. The trees and gardens will be damaged . We need more access to open spaces and nature not less. Generations have met at the zoo , benefitting from the uplifting historic buildings , gardens , lakes and animals. The premises should be safeguarded for the residents of Bristol . The zoo should think again as should the planners . Our children and grandchildren need safe outdoor spaces , please do not allow this tragic mistake.	13-Mar-23
811.	O	The zoo gardens are an important and valuable asset to Bristol and should be retained for the public to enjoy.	13-Mar-23

812. O	<p>The zoo has been such a key part of Bristol for so long, it's such a travesty to potentially see it go. The zoo holds such high community value to the people of Bristol - we have friends who were married there, I know of people's family who have their ashes scattered there. Have a city centre asset that people can walk or get the bus / public transport to is a massive boon. We do not need another expanded site off a motorway junction that necessitates getting in your car to get to it. It is such a haven away from bustling city life - the gardens are simply a joy to walk around. This loss of landscape, wildlife and trees is heart-breaking, particularly in the world we currently live in. Surely if ever there a time to prioritise green credentials and making the best use out of an existing asset, it is now? The Zoo is listed as a local Historic Park &amp; Garden and an Important Open Space - let's keep it this way. I understand there are a number of listed buildings on site, I imagine most of which will become inaccessible to the public. It is not clear to me why the zoo needs to change its use or purpose - surely there are better, greener and more community-minded ways of making changes? I think the zoo should keep animals there but focus on the smaller ones such as reptiles, butterflies, meerkats, etc. From what I have seen of the plans, the buildings look too big and do not complement the amazing buildings near the zoo site.</p>	13-Mar-23
813. O	<p>The site has significant historical value and it's future as a viable Zoo has not been explored or even proved to be insufficient. London, or any other city with such a valuable asset, would never allow such a fate to befall their beloved zoo. This is not what the public want, this is not in the best interests of Clifton or the wider community and represents a huge loss to Bristolians and everyone that has ever enjoyed time here. Children learn so much from Zoos and given the state of our planet and the need to teach children about the wider effects humans are having on animals and their habitats this will be a huge loss to future generations and the planet long term. Zoo's are hugely important assets and Bristol is missing a real opportunity to maintain and create a zoo that can do so much good to our understanding and appreciation of the natural world. 186 years should not be disregarded and destroyed in favour of fancy housing. Fancy housing can be built anywhere in the city, there are derelict sites available elsewhere. Please Save Bristol Zoo!!!</p>	13-Mar-23
814. O	<p>I have several objections to this application. 1) The loss of communal value and green urban space. 2) Harm to the several listed buildings on the site which will not be accesible to the public if the application is approved. 3) The need for a change has not been proven. The business case is not clear and alternatives have not been considered. 4) The buildings proposed are way out of scale with the surrounding buildings.</p>	14-Mar-23

815. O	<p>I object to the proposed redevelopment of Bristol Zoo Gardens, which is an 'irreplaceable resource that should be conserved in a manner appropriate to its significance so that it can be enjoyed for its contribution to the quality of life of existing and future generations' as current national primary planning guidance in paragraph 189 states. and should not be turned into exclusive luxury gated housing. For 186 years it has been an immensely valuable cultural, educational, social and economic asset to the City of Bristol and is, being the fifth oldest zoo in the world, of historic importance, with a proven track record of conservation success having helped save over 175 species from extinction. The loss of communal value as a venue for weddings and the scattering of ashes in the now threatened herbaceous border, and of course the successive generations of visitors. The proposed change of use and loss of character of the Listed buildings and the reduction of Public access to the gardens is not fitting with the Zoo's listing as a 'Local Historic Park and Garden and important Open Space' The limited public access to a relatively small space compared with recently, together with the cost of maintenance will be funded by residents with predictable objections potentially leading to the existing permissive right being modified or withdrawn completely. 162 mature trees (42.5%) of them will be removed with others threatened by future building works. The need for change is unproven, although visitor numbers were down (500,000 pre Covid) they compare favourably with other zoos (eg Dublin) and are higher than any other Bristol attractions (eg We the Curious 250,000). Only together with the Wild Place does the Zoo reach it's target number of 800,000, the Wild Place attracting fewer numbers, and incidentally being far less accessible by public transport leading to increased traffic and surprisingly, because of development limitations, being little larger than the city site. The overall design as the proposed buildings are very out of scale and character with the surrounding buildings in what is after all a conservation area. This is not a contribution to the demand for affordable homes that Bristol needs, but will be nothing more than luxury apartments with any affordable housing percentage argued down to nothing by the developers. The Zoo has had an income of over £10m with a peak of £13.6m as recently 2018, as well as financial reserves and substantial capital assets, there is no financial ruin. The strategic Plan to 2025, which can be found online, was always to keep operating two successful and complimentary sites. Whilst the charity has a duty to operate viably and realise maximum value for any assets, value does not have to mean only financial but also ethical and social. There are alternative uses of the site that would benefit not just the proposed residents but the wider community, as suggested by Save Bristol Zoo Gardens, <a href="https://savebristolzoogardens.org/vision">https://savebristolzoogardens.org/vision</a> and they should be explored in a public consultation. In the name of the immortal Johnny Morris and Animal Magic please reject this plan.</p>	14-Mar-23
--------	--	-----------

816. O	<p>I would like to object to the proposed development of the Bristol Zoo site for the following reasons: As well as providing a zoo for some species that have not been catered for by the Wild Place Project, the site provides a significant amenity for local people and draws in significant crowds. It is a long standing zoo and the proposal represents a loss of communal value and a heritage site. The case for a need to change has yet to be proven - and there are a number of attractive possibilities for the site, including keeping a zoological facility. This is an important green site that should remain accessible to the wider public and local residents. The proposal will involve a significant loss of landscape. The design of the proposed buildings are not in keeping with the area and will degrade the aesthetic building composition that prevails in this historic and important area.</p>	14-Mar-23
817. O	<p>Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	15-Mar-23

818. O	<p>I first visited Bristol Zoological Gardens in the early 1960's. This historic, heritage and cultural facility would be lost to the people of Bristol, both locally and entire city. Similarly to the wider local community who love Bristol Zoological Gardens and its location and history. Also the families of generations where ashes of deceased relatives are scattered at the site. The site is a valuable green space of peace and tranquility for thousands of people who benefit when mental health issues and other health and emotional issues are affecting their well-being. The damage that the proposals would cause to listed buildings and gates is unjustified and no longer accessible to the people of Bristol. There is no evidence to support or suggest that the zoo cannot continue as a viable Bristol public site. The proposal, with its planned buildings being "out of scale" to the site and for the benefit of the vast majority of Bristolians, does not complement the nearby houses and college. The loss of landscape, mature and important trees, and obvious environmental damage, the term vandalism comes to mind, would be unforgiveable, both to present population and generations to come.</p>	15-Mar-23
819. O	<p>Clifton is a historic district and conservation area that must protect its special status in Bristol. Allowing this monolithic, high-rise development, would be totally out of keeping with the local area and truly detrimental to hits historic status. Clifton is a tourist destination that brings an important economy to the city through its visitors. Allowing building such as this to be built will undermine the area. For decades Bristol Zoo has been one of Bristol's most iconic landmarks and all alternatives on how we can retain this historic attraction - a pride of Bristol - must be given time to be further explored. At present, it is not been proven that the zoo cannot profitably continue as a public site. Time must be given to look at viable alternative options for the development of the site, which will benefit the whole city. On these grounds I strongly object to any planning being granted to this proposal.</p>	15-Mar-23

820. O	<p>Harm to overall historic interest and significance of site. The fact that the Zoo has been there so long being of heritage value in itself. Loss of Communal Value. What it means to the people of Bristol, the generations that have visited, weddings held, ashes scattered, loss of valuable green urban space. Harm to listed buildings. There are a number of listed buildings and gates on the site. All the buildings will be turned into apartments, changed and inaccessible to the public. Unjustified harm. As well as the public loss, this change of use and the social and material harm that results is completely unjustified. Need for change of use not proven. It hasn't been proven that the Zoo cannot continue as a public site, the business case isn't clear and alternatives have not been explored. Loss of public amenity. While a green space is planned for the site, in similar cases these have become privatised and gated off. This is a real possibility here. Overall design. The buildings proposed are way out of scale with the surrounding buildings and do not complement the houses or college buildings nearby. They will form a huge continuous block along the road. Loss of landscape. Almost half the trees will go and many more may be damaged. The public green space will be much smaller. It's listed as a local Historic Park &amp; Garden and an Important Open Space.</p>	16-Mar-23
821. O	<p>This site is listed for a reason. If we ignore listed buildings then what is the point in having them? We need to preserve our heritage and stop ignoring it to make money. The site has been a beautiful setting for many years, used by so many families. A rarely seen asset in a busy city. Remember it was known as Zoological Gardens! It wasn't always just about the animals. It was a beautiful place to visit. The thought of killing established trees that have been alive longer than any of us is heartbreaking and just by replacing with small ones will not compensate for the green you are losing. Think of the environment. Think of the air. Think of the people of Bristol who rely on the space for tranquility and wellbeing.</p>	16-Mar-23

822. O	I object to the planning application for the following reasons: It is clear that the groundswell of public opinion in the area around the zoo is predominately against the planning application as it stands at the moment. The Zoo is a historic landmark site and tourist attraction in Bristol and should be kept as a Zoo or something quite similar that can be visited and enjoyed by the people of Bristol and around. At a time when we want people to use their cars less, why move the Zoo to a place out of town that is difficult for people with children to access, when the existing site is in Bristol and has good public transport links by train from nearby Clifton Down Station and 2 bus routes. It seems pretty clear that management at Bristol Zoo made little effort to develop their business plan and evolve and revise that plan to make Bristol Zoo a thriving entity. Instead of respecting the 160 year history of the zoo, they have sold out and taken the easy option to make money, sell the site for housing. By giving them planning permission to change the use we are rewarding them for their negligence and lack of vision. As a local resident who grew up near the Zoo it is clear that the plans as they stand will make Bristol worse! If I was in the planning committee I would refuse the application for housing, which would reduce the value of the site which could then be bought by a charity to be run as a public amenity for the people of Bristol.	17-Mar-23
823. O	The proposed development of the zoo site is a massive disproportionate intrusion into a conservation area. The people of Bristol who have built up this valuable heritage for future generations did not do so in order for it to be turned into private profit. The zoo has been a cultural and educational feature of the the city. It may have to adapt to present conditions but not this way which would cause detriment to the character of the locality and disadvantage to the community.	20-Mar-23
824. O	My name is Arne Ringner and in 2004 I purchased The Clifton Swimming Baths that at the time were written off as a public asset and was lined up for housing. Today the Baths are known as Clifton Lido and is a formidable community space. From all over Bristol people gather here to swim, eat and socialise. The place is class less and loved by the many. It's a public, civil and self supporting arena where anyone can hang around. These public places are rare and should be 'sacrosanctly' preserved. Many people have approached me saying thank you for giving them a place to just be , or sadly having a place to spend their last few months alive. The Zoo falls into exactly this territory. It's a public space and we absolutely cannot risk losing any more. To replace a revered public space with private 'luxury' housing is infantile.	20-Mar-23
825. O	I object to this beautiful zoo that has existed in Bristol for many many years bringing children and families such joy and interest. The zoo also brings profit with visitors all around the world learning about all the animal species here. We do not need any more property built here as thus means more people, more traffic, congestion and added pollution that already exists in this city. Protect this so it brings history, learning, profit and interest	22-Mar-23



826. O	Having examined the plans and elevations of the proposed buildings on the zoo site, I wish to object strongly to the proposals. Short of a skyscraper or a warehouse, it is hard to imagine anything more incongruous with the surrounding buildings and landscapes in this lovely part of our city.	22-Mar-23
827. O	As someone born and bred in Bristol nearly 80 years ago the Zoo & its gardens were a joy and delight and an education as I grew up. Now more recently I have had the pleasure of sharing my love of the Zoo with my grandchildren. It's development into scientific research has delighted me and with our dwindling wildlife globally, it is critical that such research continues and educates people as to the parlous state of our planet. The site of the Zoo most definitely fits the bill for this, so it is essential that it remains in public use - for the enjoyment of the glorious gardens as well as well as the science. It would therefore be the jewel in the crown for Bristol's 'green' credentials and a historic haven of peace and beauty for the city's citizens.	23-Mar-23
828. O	Much as I treasure the heritage of this city that our evolving Zoological Gardens has represented to it over these past 70 years since my childhood, I am looking forward to the flagship it can be for us all and future generations to equip and inspire in the challenges which lie ahead. I am utterly convinced that if the Trustees of the BZGs had considered picking up the baton on Bristol Green City of Europe 2015 and running with a fresh and dynamic plan for BZG 2025, as a centre of learning Green Literacy through sponsored installations, innovations and experiences of sustainability, visitors would come from near and far. Such a vision would preserve its historic trees and beautiful gardens while the heritage buildings can be imaginatively re-purposed. Hospitality, products and services can all demonstrate ethical sustainability Green business, trades and remarkable technologies can demonstrate a future proof planet. A prime goto resource for cutting edge sustainable development with programmes around the world. As a centre of learning: whether the focus is on protecting our precious soil as well as species diversity, add low carbon and low polluting ways of working, travelling, dwelling, eating, buying; even learning how to care for domestic pets before buying! It would be a centre for learning to think globally and acting locally on all the above. The Planning Committee have a huge responsibility in considering this application which if approved, would be irreversible and tragic. If you are in any doubt at all - please postpone the decision until other possibilities can be proposed.	24-Mar-23

829.	O	Upon finding out more about the circumstances surrounding Bristol Zoo's closure, I have become very concerned that the city is about to lose an important and unique piece of its history and a resource that will otherwise be incredibly valuable for future generations. Development of luxury housing in its place will provide a lucrative opportunity for the Zoo owners and the developers but will likely leave Bristol city much worse off. There does not seem to have been enough work done to prove the change in use of the site is justified. To be specific on other impacts: - There will be significant, if not total, harm to the historic significance of the site. - There will also be significant impact to the established landscape of the site, particularly trees. - The public will lose an important educational and entertainment attraction. - Bristol will lose an important part of its identity. Given the above concerns, I strongly object to this applicaiton for planning.	26-Mar-23
830.	R		31-Mar-23
831.	R		31-Mar-23
832.	O	My objections are to the buildings along perimeter of the development. While I appreciate that some effort has been made to reference the character of neighbouring buildings, the proposed buildings are far too tall and jarringly homogeneous. This looks out of place and contrasts (unpleasantly) with the mixture of buildings, light, and trees in the surrounding streets.	01-Apr-23
833.	O	I would like to object to the granting of planning permission on the following grounds: One. This is an historic heritage site, which needs to be preserved in itself, but is also potentially of much wider commercial interest to the city, if alternative public uses are allowed to proceed Two. The planning application refers to major demolition of buildings. The demolition of historic buildings should require a public enquiry. Three. The proposed cutting down of half of the trees on the site is completely out of step with the need to preserve natural habitats. Four. Housing development should take place on brownfield sites wherever possible.	01-Apr-23
834.	O	As a Clifton resident I write to object not to the principle of housing development but to the design and massing. The decision to build only on the sites of existing structures has had the unfortunate effect of forcing unacceptably massive structures onto the boundaries which are those most visible to the public on a daily basis, towering over Northcote and Guthrie roads and presenting to walkers on the Downs with an uninterrupted block of pale render, quite inappropriate to this historic area of our city. The scale and lack of quality of finish have clearly been designed to achieve the maximum financial gain. The application should be rejected and applicants be advised to look at alternative ways to reduce the scale on the boundaries, replace render with the vernacular stone of the neighbourhood and create visual gaps in the boundary structures. The result of the decision made by the committee will last well into the 22nd Century.	06-Apr-23

835. O	<p>The historic environment is a precious and irreplaceable resource from which a large section of the population derives enjoyment, instruction and inspiration. Set within the Clifton and Hotwells Conservation Area, the zoo is a rich multi-layered heritage site with its exclusive urban presence, its curated and managed exotic character and its distinctive listed buildings. Unless it is fully understood, and appropriately protected its collective significance and intrinsic character will be lost forever. The zoo enclosure is a conspicuous component of a diverse urban scene known locally, regionally and globally. Within an extraordinary surrounding landscape, it expresses contemporary and past information. Understanding this heritage underpins the stewardship of the place as a whole and presents opportunities which are yet to be purposefully explored. The intrinsic value of this unique asset set within the rich and diverse Conservation Area must not be underestimated. To a large extent its value is derived from its isolation behind tall stone walls which enclose an exotic wonderland of nature, novelty and human ingenuity. It brings together aspects of the natural world, of plants, trees, animals, birds, ecology, science, art and architecture. As a destination the zoo contains an ambience of beauty, distinctiveness, and infrastructure which entertains and delights, and offers an environment for research, and is part of life's rich pattern. To impose housing and vehicular access undermines its significance and the very nature of the historic heritage amenity. Any interventions must be minimal and subservient and "preserve or enhance" the intrinsic character and unique identity of the site.</p>	11-Apr-23
836. O	<p>Bristol Zoo Gardens has been an asset to the Bristol community for nearly 200 years. The gardens are irreplaceable in terms of what grows there and the green space is vital for health and happiness - where this is in increasingly short supply in urban areas. The gardens should be preserved for benefit of the community and could be made to work as a recreational space, and/or for events, concerts, and sporting activities. If permission is granted for this ugly and overbearing development - this will all be lost (along with many mature trees). The promise to preserve access to some of the old gardens is an empty one and would be almost impossible to preserve and protect. The idea of cars being parked on this space terrible. Please reject the application and save this amenity for us all.</p>	13-Apr-23
837. O	<p>There was talk from the current owners of this site becoming a conservation hub for Bristol, which would be more in keeping with the founders wishes and serve the people of Bristol more fully. I see no mention of development in that direction.</p>	15-Apr-23

END OF DOCUMENT

WARD: Clifton

SITE ADDRESS: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

APPLICATION NO: 22/02889/LA Listed Building Consent (Alter/Extend)

DETERMINATION DEADLINE: 3 February 2023

**Works to listed buildings to facilitate the redevelopment of the site to include 196 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure. Works to listed building including: access-works to the Guthrie Road entrance gates; the conversion of the Entrance Lodge to facilitate community floorspace, the residential conversion of the Giraffe House, and various restoration and refurbishment works to the Aquarium (former Bear Pit), Monkey Temple, and Birds of Prey Aviary to secure their future as part of accessible landscaped gardens.**

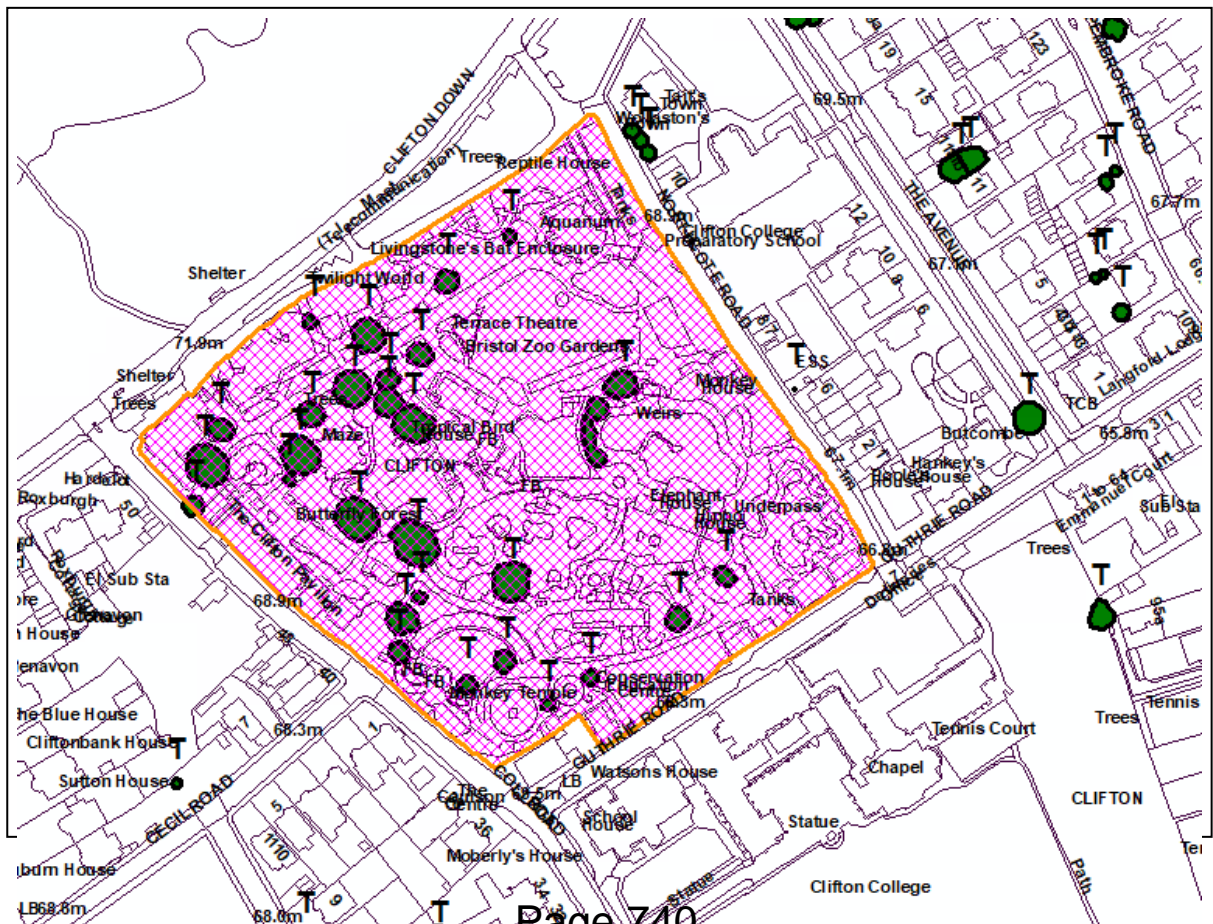
RECOMMENDATION: Grant subject to Condition(s)

AGENT: Savills (UK) Limited  
Embassy House  
Queens Avenue  
Bristol  
BS8 1SB

APPLICANT: Bristol, Clifton & West Of England Zoological  
Society Ltd  
Bristol Zoo Gardens  
Guthrie Road  
Bristol  
BS8 3HA

*The following plan is for illustrative purposes only, and cannot be guaranteed to be up to date.*

LOCATION PLAN:



**Development Control Committee A – 26 April 2023**  
**Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

## **REASON FOR REFERRAL**

The application is referred to Committee due to the significance of the proposed development and the response the application has received from members of the public.

## **SUMMARY**

Bristol, Clifton and West of England Zoological Society (“the Society” or “the Applicant”) has closed Bristol Zoo Gardens (“the site”), meaning a proposal to re-use or redevelop the site is needed. Accordingly, there is a need to secure a future use, or mix of uses, for the site that can provide the long-term management of the open spaces (including the historic buildings within the landscape). The Applicant has applied for full planning permission to redevelop the site. Full planning permission is sought to redevelop the site to provide 196 residential dwellings (including 20% affordable) alongside approximately 500 sq. m Class E (commercial, business and service), F1 (learning and non-residential institutions) and F2 (local community uses) floorspace, a children’s playground, provision of free public access, between 8am-7pm in the summer (June – September) and 8am-5pm for the remainder of the year, restoration of listed buildings, provision of new accesses (pedestrian, cycle and vehicular), associated parking, enhancement of lake, and biodiverse green roofs and photovoltaic solar panels incorporated throughout (ref. 22/02737/F).

This report concerns the Applicant’s application for listed building consent, which is required to facilitate elements of the development referenced above, where works are proposed to demolish, alter or extend listed buildings. Specifically, listed building consent is needed and sought for works to the following Grade II listed buildings:

- Entrance Lodge (Guthrie Road Gates) – the proposal seeks to convert the building to form a community focussed building, comprised of a mix of uses, including a café, exhibition area, education and meeting room, and WCs (Classes E, F1 and F2).
- Giraffe House – proposed to be converted into a single-family home.
- Bear Pit (Aquarium) – the proposal is to refurbish the aquarium to better reveal the original form of the building as a bear pit. The building will be integrated into the landscape as a feature accessible to the public.
- Monkey Temple - the proposal seeks to reopen access up the steps to the Monkey Temple and reinstate the historic Buddha statue. The proposal integrates the Monkey Temple into the proposal’s open space offering.
- Eagle Aviary (Birds of Prey Aviary) – the proposal seeks to convert the animal enclosure to a seating area integrated into the proposal’s open space offering.
- Guthrie Road Entrance Gates (South entrance gates and flanking walls) – the proposal seeks to be mechanise and refurbish the gates.

The proposals included within application ref. 22/02737/F will impact the setting of listed buildings and other heritage assets, including the Clifton and Hotwells Conservation Area. These impacts are considered under application ref. 22/02737/F, rather than this application for listed building consent, which only concerns the works proposed to alter the listed buildings referenced above.

Overall, the works proposed to the listed buildings are appropriate, paying special regard to the features of special architectural or historic interest which the respective listed buildings possess. Some minor harm is posed by the development, but in each case the harm is justified and outweighed by heritage gains to the respective building. It is recommended that listed building consent is granted subject to condition in accordance with Key Issue D ‘Conclusion and Recommendation’.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

## **SITE DESCRIPTION**

The site has operated as a Zoological Garden since 1836. In addition to the Zoo Gardens use, ancillary uses at the site include a café/restaurant, event space, an education centre and a gift shop. The Zoo closed in 2022. The site is relatively flat and developed with a number of single and two storey buildings and significant landscaping. In addition, there are many animal enclosures of different sizes and forms, between which are garden areas, pedestrian walkways and a central lake. Elements of this layout remain from the early form of the site, including the Grand Terrace and the lake, although the form of the lake has evolved over the lifetime of the zoo. The site is enclosed by a perimeter wall and buildings that extends around most of the site. Paid public access is controlled through the ticket office at the north west corner of the site, with other points of access limited to servicing.

The site is bound by a car park and the A4176 (Clifton Down) to the north, beyond which is Clifton Down itself (both the car park to the north and the Downs beyond represent Common Land); Guthrie Road is to the south, beyond which is Clifton College; Northcote Road to the east, beyond which are Clifton College Preparatory School, boarding houses and residential dwellings; and College Road to the west, beyond which are residential properties and a former car park which has received planning permission for the erection of 62 dwellings (ref. 21/01999/F).

The Local Plan designated the site as Local Historic Parks and Gardens and the site is within the Clifton and Hotwells Conservation Area. This application concerns all six of the Grade II listed buildings within the site: Bristol Zoological Gardens entrance, Giraffe House, South entrance gates and flanking walls (Guthrie Road), Bear Pit, Monkey Temple, and Eagle Aviary. There are also locally listed buildings on the site, and the development would impact the setting of other non-designated heritage assets in the locality, as well as designated heritage assets, including Clifton College's collection of listed buildings to the south of Guthrie Road and the Downs Conservation Area to the north.

## **APPLICATION**

The works proposed to the listed buildings are explained within the 'SUMMARY' section, and are also discussed in detail within Key Issue C.

There is also an accompanying full planning application seeking planning permission for 196 residential dwellings (including 20% affordable) alongside approximately 500 sq. m Class E (commercial, business and service), F1 (learning and non-residential institutions) and F2 (local community uses) floorspace, a children's playground, provision of free public access, between 8am-7pm in the summer (June – September) and 8am-5pm for the remainder of the year, restoration of listed buildings, provision of new accesses (pedestrian, cycle and vehicular), associated parking, enhancement of lake, and biodiverse green roofs and photovoltaic solar panels incorporated throughout. Ref. 22/02737/F.

## **RESPONSE TO PUBLICITY – NEIGHBOURS**

The application was advertised by site and press notice, and neighbours were notified of the application by letter. In response to the submission of amended plans and further information (largely concerning the application for full planning permission), additional notification occurred in November 2022 for 21 days.

**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

In total, 24 objections and 1 support comment have been received (as of 17.04.23). These comments are summarised below, comments made by key local stakeholders such as interest groups or residents' associations are summarised under their respective groups names. Please see the Appendix 1 and 2 to this report which includes a record of the representations received in respect of this planning application. Due to the limits of the Council's IT System and the number of representations received, the record of consultation responses included in the appendices is not exhaustive. However, officers have reviewed all the representations and are satisfied that all material matters raised have been adequately summarised in the report itself.

**Objection Comments:**

## i. Impact on Heritage Assets

- The proposal will harm the listed buildings on Guthrie Rd at Clifton College.
- The proposal will fail to preserve or enhance the character or appearance of the Conservation Area.
- The cumulative effect of high density housing development on West Car Park and Bristol Zoo will result in a canyon effect.
- The impact on the historic garden is unacceptable.
- The six storey northern block is too tall.
- The buildings have a generic appearance.
- The proposals are not consistent with the Victorian buildings in the area.
- The proposal will result in the loss of historic boundary features.
- Support for criticisms levied by the Victorian Society, and Historic Buildings and Places.
- The application proposals breach the Planning (Listed Buildings and Conservation Areas) Act 1990 (the "LB and Conservation Areas Act") in failing to preserve or enhance the character or appearance of the area (Article 72(1)).
- The Clifton Conservation Area Appraisal lists Bristol Zoo among six "crucial landmarks nationally and on Bristol's landscape" (para 6.3.2). "The variety and quality of views in Clifton are a critical component of the area's special interest," (para 6.2.3) The proposals conflict with Long View L25, Local View LC21 and a Landmark of City Wide Importance (see Map 4). The cumulative effect of high density housing development on West Car Park and Bristol Zoo will result in a canyon effect. This will result in substantial harm to neighbouring listed buildings, heritage and the Clifton Conservation Area, in conflict with the Appraisal and the LB and Conservations Area Act.
- The application is contrary to policy BCS22.
- The proposal will result in substantial harm to the Conservation Area and important listed buildings on Guthrie Rod at Clifton College.
- Disagreement with Historic England's assessment and comments.
- The architecture is not suitably informed by the local character.
- The external spaces proposed are not effective, balconies are not suitable.
- The roofscape should respond to the listed buildings and the historic streets of Clifton.
- The architecture should be green.
- Support for the analysis of the Downs for People, the objections of the Victorian Society, Bristol CAP, and Avon Gardens Trust.

## ii. Other Matters

- There is no reasonable justification for building on the gardens, which should be preserved for future generations.
- There is insufficient justification for closing the Zoo.
- The Zoo should be a public asset.
- The loss of public amenity and green space should be resisted.

**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- The loss of community facilities is not justified.
- The affordable housing is not integrated into the development.
- Another tourist attraction should take the site on.
- Acknowledgement of housing need.
- The proposals will detrimentally impact neighbours' privacy, including pupils at Clifton College.
- Traffic from the development will detrimentally impact Clifton College and its pupils.
- Concerns that building height will overshadow gardens.
- The houses will not be affordable.
- This space, without animals, should be for all the people of Bristol to enjoy. The proposed plans do not reflect this ethos.
- The proposal will result in the felling of a significance number of trees.
- The development will only benefit those who live within in it.

**Support Comments:**

## i. Heritage Assets

- The designs are sensitive, only building where existing buildings exist.

## ii. Other Matters

- The development will provide much-needed housing.
- The development will provide access to the gardens for the people of Bristol for free.

**Downs For People**

Downs for People (DfP) co-ordinated objections to the zoo using the Downs off Ladies Mile as its main car park. It challenged the licensing of this use in the High Court in 2020: this led to a court order in 2021 establishing that no part of the Downs can be used for parking for non-Downs activities from the end of 2023. DfP members have unrivalled expertise in the history of zoo parking and examined the zoo's finances in relation to successive planning applications. We are sad the zoo is closing: our objective now is to ensure that the zoo's departure benefits those using the Downs for recreation as much as possible.

Summary

Downs for People (DfP) has four comments on these proposals:

I. Strong statutory measures, not just planning conditions, will be needed to secure public access to the zoo grounds. If the zoo must close, Downs for People supports this application insofar as it may create public open space to complement what is available on the Downs. Recreational use in perpetuity cannot be secured by a planning condition or section 106 agreement. Something stronger, like dedication under section 16 of the Countryside and Rights of Way Act 2000 and/or designation as a town or village green under the Commons Act 2006, is required. In addition, the zoo should establish an endowment fund for future maintenance.

II. Parking history has been mis-represented as a reason for closure. In particular:

1) Visitor numbers have never been constrained by lack of parking: in its annual accounts the zoo has identified this only as a possible future risk.

2) DfP's successful High Court challenge did not result in the zoo being left with no parking. It still had its surface West car park. The zoo has decided to build housing on this. (A modest multi-storey car park there could have made up for the spaces lost elsewhere.) There is anyway still significant on-road parking in the streets around the zoo and on the Downs.



**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

3) In 2019, before COVID struck, the zoo published a strategy to develop the Wild Place as its main site and to keep the Clifton site as a local attraction. Parking for the Clifton site was not seen as a problem.

III. The zoo has exaggerated the fall in pre-COVID visitor numbers and its financial difficulties. The zoo's finances appear healthy in its annual accounts, with profits in the three years before COVID. It described itself as 'flourishing' when it last applied for planning permission in 2016/17. Visitor numbers may be lower than in the 1960s but have not fallen dramatically in recent years. The zoo's insurers have covered most of its COVID losses. There seems no compelling financial reason to close the Clifton site other than to make money to develop Wild Place.

IV. The constraints on the use of the Downs north of the zoo – and the potential of the land - need clarification. All the land between the zoo's north boundary and the main road, including the land outside the zoo's main entrance, is part of Clifton Down. Under the 1861 Downs Act, this land must be used for the public resort and recreation of Bristolians. It is also common land, to which there is a right of access on foot. The pedestrian route along the zoo boundary wall probably qualifies as a public right of way through long use.

The recreational value of this land should be maximised. The creation of a grand entrance to the proposed conservation hub and the retention of a large car park (that could only be used by visitors to the Downs) would not achieve this. The construction of large buildings on the boundary of the land would reduce the recreational value of this part of the Downs.

**RESPONSE TO PUBLICITY – INTERNAL AND OTHER STATUTORY CONTRIBUTORS**

This section summarises consultation responses received from statutory contributors and interest groups. Appendix 1 and 2 to this report includes a record of the representations received in respect of this planning application. Due to the limits of the Council's IT System and the number of representations received, the record of consultation responses included in the appendices is not exhaustive. However, officers have reviewed all the representations and are satisfied that all material matters raised have been adequately summarised in the report itself.

i. **Urban Design Team (BCC) – no objection:**

Summary:

- Bristol Zoo is one of the earliest provincial zoos in the world and is consequently a highly significant heritage site.
- The relocation of the zoo to enable greater focus on its valuable conservation work is recognised.
- The proposals include heritage gains including improvements to the site boundaries and adaptive reuse of designated and non-designated heritage assets.
- However, the proposed new residential units within the site and the scale and massing of apartment blocks around the perimeter of the site lead to less than substantial harm (NPPF, paragraph 202) to the significance of the Clifton and Hotwells Conservation Area and setting of listed buildings within and around the site.
- Clear and convincing justification for any harm to the significance of heritage assets is required in accordance with paragraph 200 of the NPPF. The applicant has stated that the level of harm caused by the scale, massing and general quantum of the proposed development is required to ensure the delivery of the heritage gains and public benefits of the scheme.

**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

- Revised plans and documents were submitted in late October/early November 2022, the Planning Statement and Design and Access Statement explains the key changes made. These comments respond to those submissions. A Vu.City model has also been provided, any views that have been relied upon when making these comments are included within the document.

Heritage assessment:

The site and its contents are subject to a number of local and national designations with regard to historical and cultural significance, including:

- Local Historic Park and Garden – the site
- Clifton and Hotwells Conservation Area (within)
- The Downs Conservation Area (immediately to the north)
- Listed buildings:
  - Bristol Zoological Gardens entrance (Grade II), north west corner of site
  - Giraffe House (Grade II), south eastern side
  - South entrance gates and flanking walls, Gurthrie Road
  - Clifton College, various Grade II and Grade II\* listed buildings (to the south)
  - Bear Pit (Grade II), within the site
  - Monkey Temple (Grade II), within the site
  - Eagle Aviary (Grade II), within the site
- Locally listed building:
  - The Clifton Pavilion (west side of site, facing College Road)
  - Clifton Music School (southern tip at junction of College Road and Guthrie Road)
  - Clifton College Preparatory School (north east)
  - Houses on Clifton Down (to the west)

Significance (NPPF, paragraph 194/5)

Bristol Zoological Gardens opened in 1836 and is predated only by Paris, London and Dublin zoos. Features from the original design of the zoo survive including the entrance lodges (listed grade II), the former bear pit (listed grade II) and terrace promenade.

Later features of the zoo landscape are also surviving nationally important heritage assets such as the former giraffe house (listed grade II), monkey temple (listed grade II), Guthrie Road entrance gates (listed grade II) and eagle aviary (listed grade II).

The zoo and its landscape make a positive contribution to the character and appearance of the Clifton and Hotwells Conservation Area, it is a locally designated historic park and garden and contains the locally listed Clifton Pavilion. The zoological gardens have been an important cultural asset for the city for nearly 200 years with multiple generations enjoying visits to both the animals and high-quality planted landscape. Consequently, the site has immense communal value in addition to the demonstrable architectural, aesthetic and historic values.

This significance is recognised by the applicant in their heritage assessment and has informed aspects of the proposals such as the reuse of the entrance lodges, bear pit, monkey temple, eagle aviary, Clifton Pavilion.

Assessment of impact (NPPF, paragraphs 199-204):

The relocation of the zoo poses many challenges particularly where there are so many important aspects to the site as summarised above. The proposal offers opportunities particularly where the

**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

practical necessities of running a zoological garden in a residential neighbourhood have led to parts of the site making a neutral or negative contribution to the character and appearance of the conservation area.

The boundaries to the site, particular along Northcote Road on the east side of the site and in the middle section of the College Road boundary are proposed to be improved through this development offering an enhancement to these aspects of the conservation area.

The retention and reuse of numerous assets within the site; entrance lodges, bearpit, monkey temple, eagle aviary, giraffe house, Clifton Pavilion and the approach to the listed Guthrie Road entrance are welcomed as heritage gains. Similarly, the free public access proposed to the gardens between the hours of 8am and 5pm represents a heritage benefit, given it will increase public interaction with a number of heritage assets within the site.

Despite these gains the proposals will cause a degree of less than substantial harm to the character and appearance of the conservation area and setting of heritage assets within and around the site.

This harm will be caused by the scale and massing of the perimeter residential blocks and the introduction of residential dwellings within the historic landscape.

This part of the Clifton and Hotwells Conservation Area is predominantly characterised by large Victorian residential villas that front Clifton and Durdham Downs and surrounding streets as recognised by Panoramic View 21 in the Character Appraisal. The type of large residential apartment blocks proposed for the zoo (as demonstrated in view 1 of the appendices) will consequently differ from this character and not preserve or enhance the character and appearance of the conservation area as required by the Act (Town and Country Planning (Listed Buildings and Conservation Areas) Act, 1990).

The block on the northern boundary also harms the setting of the listed entrance lodges as demonstrated in view 2 of the appendices where the current significance of the entrance lodges includes their visual dominance in the landscape despite their low architectural form.

The applicant has introduced some design changes to the scheme in light of previous comments. These have helped reduce the impact, however, introducing greater void (windows) to solid (wall) ratios and/or greater (deeper) recesses in the areas of the circulation cores particularly with the block on the northern boundary would help to break down the massing and create a more villa type appearance thereby reducing the level of harm.

The scale and massing of the other blocks around the site also causes less than substantial harm to the character and appearance of the conservation area and setting of listed buildings such as the listed Clifton College buildings on Guthrie Road as demonstrated in views at the junction of Northcote Road looking towards College Road (Local Views 26, Character Appraisal and view 3 of the appendices).

The impact on the setting of the Clifton College heritage assets is reduced in views from the south, such as from the cricket pitch, where only a slight if any impact is visible in views such as view 4 of the appendices (Long View 25, Character Appraisal).

The proposed 'lake house' villas within the zoo landscape are architecturally interesting buildings that complement the design aesthetic of the retained zoo buildings. However, by introducing

**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

private residential dwellings to what is currently a quality landscape that is perceived as public will cause cumulative harm to the conservation area and local historic park and garden. This harm will be caused by the introduction of vehicular movement and car parking to what is currently a largely vehicle free landscape. These private dwellings and their associated aspects will change the perception from being a public to a private landscape impacting the communal value of the site as well as the landscape qualities. This will be particularly evident when looking into the site from College Road (view 5 of the appendices, also identified as Local View 21 in the Character Appraisal) where the landscape will appear to be a private residential street as opposed to a public historic landscape.

The proposed northern block will not materially harm the significance of the Downs Conservation Area due to the topography of Downs and the screening provided by the existing trees.

Urban Design:

The height, scale and massing of the development has been assessed in relation to heritage assets and the character of the area, the harm associated with this has been discussed contrary to policy DM26 and 27. The layout directs the majority of the development to the site's edges reinforcing the 'walled' character of the site. With regard to policy DM28, the development will create a safe, attractive, high quality, inclusive and eligible public realm, both within and outside of the site. As distinct new part of Clifton, the new buildings as proposed will introduce high quality materials to the townscape in accordance with policy DM29.

Conclusion:

Clear and convincing justification for any harm to the significance of heritage assets is required in accordance with paragraph 200 of the NPPF. The applicant has stated that the level of harm caused by the scale, massing and general quantum of the proposed development is required to ensure the delivery of the heritage gains and public benefits of the scheme. These heritage gains include the retention and reuse of the various heritage assets (designated and non-designated) and enhancement to aspects of the conservation area as detailed above.

Public benefits provided by this scheme that can contribute to the planning balance as defined by paragraph 202 of the NPPF include; free public access to the gardens and a cultural strategy that will encourage greater community use of the assets. Planning conditions and agreements will be required to secure these benefits should this proposed development receive consent.

Archaeological conditions to secure the recording of the heritage assets prior to and during the development works will also be required in accordance with paragraph 205 of the NPPF and Supplementary Planning Document 7. This should include the pre-commencement condition to secure an archaeological programme of works and historic building recording and watching brief conditions.

ii. **The Twentieth Century Society (statutory consultee) – no objection**

The Society has no objections to the majority of the work proposed to the 20th-century buildings and enclosures on the site. We do not take issue with the proposed reuse of the Grade II Birds of Prey Aviary as a seating area, and we support plans to restore the Grade II Monkey Temple as a garden folly. We are pleased that the Terrace Theatre (2003) will be retained as a community facility. When we first reviewed the application, we were concerned about the proposed two-storey zinc tile-clad rooftop extension to the 1930s Clock Tower Building which we felt would have a

**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

detrimental impact on the building. The architects have now revised and improved the design and, as such, we do not wish to comment on this aspect of the scheme.

iii. **The Victorian Society (statutory consultee)** – objection

Final Comments:

Thank you for consulting the Victorian Society on amendments to the original proposals for the redevelopment of Bristol Zoological Gardens. However, having reviewed the latest documentation our objection remains.

In our previous objection we drew attention to the site's high significance as one of Europe's earliest zoological gardens, and one which continues in this use. Furthermore, we highlighted the important role it plays in contributing to the significance of the Clifton Conservation Area and the setting of nearby designated and non-designated heritage assets.

The proposals which would see the site adapted to a new use, with a quantum of development alien to the character of the site and the Conservation Area, would cause serious harm to significance as outlined in our previous consultation response.

The amendments which comprise of minor design changes do not address these concerns and the proposals remain substantially as first presented. Our serious concerns about the harm the scheme would cause to the significance of the site, Conservation Area and nearby designated and non-designated assets remain.

The NPPF is clear that it is desirable to '*sustain and enhance*' the significance of heritage assets (para 190a), and that '*great weight should be given to the asset's conservation*' (para 199). Furthermore, that '*Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.*' (para 206). The amended proposals do not ensure this, and the Victorian Society maintains its objection to the proposals.

Initial Comments:

Bristol Zoological Gardens is a site of high architectural and historical significance. The fifth zoo to open in Europe, it is one of only three remaining 1830s zoological gardens in the British Isles. Its rarity as an early example of this type of landscape, its surviving historic zoological buildings, and continued use for its original purpose make it extremely significant. Furthermore, its place within the Clifton Conservation Area and relationship to nearby listed buildings mean that the Gardens are very sensitive and significant alteration is likely to cause a degree of harm not just to the Gardens themselves, but to the Conservation Area and nearby heritage assets.

The Victorian Society understands Bristol Zoological Society's desire to vacate the Gardens and we acknowledge that the principle of some degree of residential development could be acceptable. Irrespective of any future redevelopment, however, the departure of the zoo from the site will seriously harm the historic significance of the Gardens. We are also concerned by aspects of the design of the proposals.

**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

Bristol Zoological Gardens is characterised by its low density, small scale, historic (listed) buildings, situated within a mature landscape, contained within a perimeter wall. This means that although the Gardens retain a discreet character of their own, distinct from the surrounding Conservation Area, they nonetheless make a positive contribution as an oasis within the surrounding built environment. The zoo does not compete with the neighbouring buildings for prominence, and it succeeds in preserving an openness towards the Downs. Importantly, despite alteration since opening in 1836, the site remains legible as a historic 19th century Zoological Gardens within a wider 19th century locality, something, as noted above, which is exceptionally unusual and significant.

The proposed development would seriously harm the significance and character of the site and the Conservation Area. The density and height of the new buildings would represent a gross overdevelopment and erode the character and legibility of the historic landscape. The height of the buildings around the perimeter of the site mean that the gardens would be cut off completely from the surrounding Conservation Area, effectively turning them into gardens for the benefit of the new development, rather than the wider locality. The height of the buildings would also harm the Conservation Area and nearby listed buildings by introducing a scale, form and architectural idiom at odds with the Conservation Area. The new buildings would compete with the listed Clifton College and the nearby 19th century housing, diminishing their prominence. They would also destroy any impression of openness linking the site to the Downs. These effects would be heightened by the lack of significant gaps between the proposed buildings, especially those to the north west and north east. Any acceptable proposal would be of a lower scale and density, better preserving the Garden's character and positive contribution to the Conservation Area.

Ultimately, this gives rise to the concern that the proposed development is not informed by a full understanding of the history and character of the site. Surviving zoological gardens of the 1830s are very rare and it is important that proper study of the site is undertaken to identify which parts of the original design survive. Any proposals must be based on these findings and seek to enhance and sustain this significance, ensuring that the gardens remain a heritage asset which can be fully appreciated by the public.

The NPPF is clear that it is desirable to '*sustain and enhance*' the significance of heritage assets (para 190a), and that '*great weight should be given to the asset's conservation*' (para 199). Furthermore, that '*Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.*' (para 206). This proposal would not enhance or better reveal the significance of the site and nearby heritage assets. The Victorian Society objects to the proposal in its current form.

**iv. Historic Buildings and Places (Ancient Monuments Society) (statutory consultee) – objection**

While the departure of the Zoo from this site will harm the overall historic and communal value of the Gardens, HB&P acknowledges that an element of residential development is acceptable to secure the future of the site. However, we do have concerns with some aspects of the application.

We welcome the proposals to retain the 'parkland' setting around the central lake as well as the removal of later unsympathetic accretions to the designated and local heritage assets, and their refurbishment as parkland follies and dwellings. We agree that the location of the new apartment

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

buildings is best located to the perimeter of the site, as proposed, however, their height and scale is excessive and harmful to the setting of the listed Zoo buildings and to the character of the conservation area. The existing buildings to be demolished are small scale and of different heights with spaces between each building, whereas the proposed buildings present a solid built form extending along each frontage, with little permeability beyond the formal entrances. The design and massing of these new buildings, particularly those on Guthrie Street opposite the listed Clifton College buildings, don't appear to fit well within the streetscapes of the conservation area, and at up to 6 stories, are too tall for the area. While not a listed building, the Art Deco clock building contributes to the story and development of the zoo over time. The roof extension is clumsy and doesn't respect the elongated proportions of the building, harming its appearance. Retaining it in its existing form would be preferable, and would provide a needed gap between the taller new buildings to either side.

While we don't oppose a modern architectural design, the design of the perimeter buildings should be reconsidered to better reflect the modulation, scale and rhythm of the neighbouring development to ensure the new development will contribute to and enhance the historic interest and significance of the conservation area.

Paragraphs 195, 199, and 200 of the NPPF (2021) are relevant.

Chapter 16 of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990 establish the requirements to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. I would be grateful if we could be informed of the outcome when this becomes available.

v. **Historic England (statutory consultee) – no objection**

Third Comment: The additional information and minor amendments have no material bearing on the advice which we have previously given ("Second Comments"). I therefore refer you to our previous letter of 23 November 2022 (our reference L01508753), the comments of which still stand.

Second Comments:

While the proposals are found to be a sensitive response to their historic context, a considerable aspect of the site's significance is bound up in its continued use as a Zoo since the early 19th century. The closure will have a pronounced harmful impact on the significance of the site. The loss of the Zoo from the site is partially mitigated through good design, retention of much of the historic planting and landscape, and allowances made for future public access. There are some heritage benefits to the proposals, especially the removal of later accretions to the listed structures, and the restoration of those buildings.

In response to the initial proposal, Historic England advised that the upward extension to the Clock Tower building and façade of Block S2 on Guthrie Road could be improved, in order to preserve and enhance the character and appearance of the Conservation Area. The submitted amendments proposals addresses these concerns, and these buildings suitably address the Conservation Area and context. Amendments to the northern block represent an improvement, and the new openings introduced within the walled perimeter strike an appropriate balance the preservation of the walled perimeter with the desire to invite users to enter the site. Overall, the amendments made are not opposed.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

The Planning Balance

The proposals will cause harm to the character and appearance of the Hotwells and Clifton Conservation Area. A significant part of that harm is derived from the loss of the Zoo from the site, which it appears cannot be avoided as the site is no longer compatible with modern standards of animal welfare.

The introduction of vehicular traffic into the site will have marked adverse impact on its character and appearance. As we have noted previously, the traffic-free nature of the gardens contributes to their tranquillity and sense of “otherworldliness”. You will need to be satisfied that vehicle movements have been kept to the absolute minimum necessary to service the proposed accommodation.

The site is not allocated in the statutory local plan, and as such your authority will need to carefully consider both the principle of residential development and the quantum of new homes. If you consider both the principle and quantum acceptable, our view is that the harm has been mitigated as far as possible through good design.

This allows you to proceed to the “planning balance” of weighing the less than substantial harm to the character and appearance of the conservation area against any wider public benefit offered by the proposals, in accordance with NPPF paragraph 202.

There are a number of heritage benefits associated with the proposals which should be considered alongside any wider public benefits. These include the retention and restoration of all the listed structures within the site, and the provision of free public access to the retained garden areas. We continue to encourage your authority to secure this public access through legal agreement, should you be minded to recommend approval of these applications.

As per our previous advice, we also recommend that details of a strategy to interpret and understand the history of the site should be subject to an appropriately worded planning condition, if approved.

Recommendation

No objection to the applications on heritage grounds.

Initial Comments: see Appendix/Supporting Documents for full comments.

vi. **Conservation Advisory Panel** – objection

Any comments on this application are tied to the position regarding the full planning application (22/02737/F).

However, the substantial harm to the setting of the listed buildings would not be outweighed by substantial public benefit. The context of the listed buildings would be completely eroded and their original purpose would no longer make sense within the proposed development. The proposal does not accord with relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported

**Officer Note:** Whilst there are objections, for example from the Victorian Society and Historic Buildings and Places, there are no instructions from them requesting the Council to notify or refer the



**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

application to the Secretary of State. As such, there is no requirement for the Council to notify or refer the application to the Secretary of State in the case Members resolve to grant listed building consent, as per the Heritage Direction 2021 and the Planning (Listed Buildings & Conservation Areas) Act 1990.

**RELEVANT POLICIES AND GUIDANCE**

Planning (Listed Buildings & Conservation Areas) Act 1990

National Planning Policy Framework, July 2021 – referred to as “**the NPPF**”

Planning Practice Guidance (“the PPG”), Historic Environment Section including the following subsections: Overview, Decision-making, Designated heritage assets, Heritage consent process, Consultation and notification requirements for heritage related applications, and Further information on heritage and planning issues

Bristol Local Plan comprising Core Strategy (Adopted June 2011)

Site Allocations and Development Management Policies (Adopted July 2014)

**EQUALITY ASSESSMENT**

The Public Sector Equality Duty is a material planning consideration as the duty is engaged through the public body decision making process. Section 149 of the Equality Act 2010 provides that a public authority must in the exercise of its functions have due regard to:-

- a) eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Act
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- c) foster good relationships between persons who share a relevant characteristic and those who do not share it.

During the consideration of this application due regard has been given to the impact of this scheme in relation to the Public Sector Equality Duty in terms of its impact upon the groups with protected characteristics as set out in the Equality Act 2010. These characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The majority of the development’s impacts are assessed thoroughly within regard to the Public Sector Equality duty within the corresponding report for the application for full planning permission. Nevertheless, in respect of the works that require listed building consent, the works to the Bear Pit should be considered in respect of the Public Sector Equality Duty.

The Bear Pit is proposed to be restored to its original built form and incorporated into the landscape as a raised viewing platform. There is only access to the platform via steps, other means of access such as through a lift or a ramp would harm this Grade II listed building’s significance, and hence there is justification for this element of the development not being accessible for those who cannot use steps. Specifically, the countervailing factor concerns the need to allocate great weight to the designated heritage asset’s conservation.

The LPA has had due regard to the Public Sector Equality Duty contained in the Equality Act 2010 when making the assessment set out in this report. The approval of this application would not have any adverse impact upon any protected group, save for the development not including step-free access to the raised viewing platform within the Bear Pit, albeit the great weight given to the conservation of the Grade II listed building outweighs the failure of the development to allow access to

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

the viewing platform for all. Therefore, the requirements of section 149 of the Equality Act 2010 have been fully considered.

## **KEY ISSUES**

### **(A) LEGISLATION AND GUIDANCE**

Works in respect of listed buildings are restricted by s.7 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”). S.8 of the Act authorises works to listed buildings, where written consent for their execution has been granted by the Local Planning Authority (LPA). The LPA may refuse or grant consent subject to conditions, in considering whether to grant listed building consent, s.16 of the Act requires the LPA 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. As such, applications for listed building consent are not determined in accordance with the Development Plan in the same way in which a planning application is required to. However, planning objectives included within such Development Plan Policies relevant to heritage asserts and design are likely to be material to the consideration of applications for listed building consents, as is the NPPF. Hence the remaining assessment has had due regard to the Development Plan and the NPPF. The key assessment to make is with regard to the proposal’s impact on the special architectural or historical interest of the affected listed buildings.

Further to this, s.66 requires LPAs to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historical interest which it possesses. Similarly, as required by s.72 of the Act, when exercising planning functions, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area Conservation Area, in this case the Clifton and Hotwells Conservation Area. These assessments are more relevant to the accompanying application for full planning permission (ref. 22/02737/F), and hence has been considered as part of that application. Similarly, matters raised by members of the public and other contributors that do not relate to the proposal’s impact on the special architectural or historical interest of the six listed buildings this application concerns, are not relevant to this application’s assessment, but are assessed as part of the full planning application (ref. 22/02737/F).

Conservation Areas and listed buildings are considered to be ‘Heritage Assets’ by both the Development Plan and the National Planning Policy Framework (NPPF). Policy BCS22 ‘Conservation and the Historic Environment’ aims to safeguard or enhance heritage assets, as does policy DM31 ‘Heritage Assets’ which requires new development to preserve, and where appropriate enhance the elements which contribute to the special character and appearance of Conservation Areas.

Section 16 of national guidance within the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset; great weight should be given to the asset’s conservation, with any harm or loss requiring clear and convincing justification. Paragraph 200 of the NPPF states that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Further, paragraph 201 states that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Finally, paragraph 202 states that where a development proposal will lead

**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

The Setting of a heritage asset is defined within the NPPF (Annex 2) as: “The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, and may affect the ability to appreciate that significance or may be neutral”.

**(B) SIGNIFICANCE OF THE LISTED BUILDINGS**

The significance of the Grade II listed buildings considered by this application are accurately assessed within the submitted Heritage Statement and discussed below.

Entrance Lodges: The Lodges represent the original Georgian fabric, the linking building and extension to the south are not original. These two lodges are the oldest structures on the site (along with the former Bear Pit), designed as the fine entrance to Zoo, and as such have high historic interest. As good examples of late Georgian architecture, they have high architectural interest. Their significance is recognised by their Grade II listing. The surviving sections of dwarf limestone wall with iron railings to the east and west of the pair of lodges are also highly significant as part of the designed entrance. Although a century younger than the original lodges, the 1936 frieze has strong associations for people arriving at the zoo over the last century and is also considered of high historic interest.

Giraffe House: The original fabric of the Giraffe House, excluding the later northern extension, is one of the oldest surviving animal houses at the site, giving it high historic interest. The style of its architecture, with domestic-scale gabled dormers and Tudor-style windows, contrasting with the Alice-in-Wonderland-like, out-of-scale doors, is well preserved, giving it high architectural interest. Internally the building has been stripped and there are no features of significance.

Bear Pit: The vaults, steps, octagonal stone structure, balustrade and central circular opening of the aquarium building, are the original and well-preserved form of the early nineteenth-century bear pit. The form of the building is both well preserved and unique, giving it high historic interest as an example of an early animal enclosure. The structure was an exciting visitor experience both for the close views of the bears but also for fine views of the surrounding gardens, giving it high communal interest. The unusual octagonal architecture and double steps are well designed, and have high architectural interest. Although not included in the listing and not physically attached to the structure, the proximity of the surviving bear pole adds historic interest to the building.

Monkey Temple: This structure is also unique, and though it is simply made and not constructed from fine materials, it is an interesting early example of a Hagenbeckian animal house designed to mimic both a natural habitat and the setting of a famous fictional story. Today, it is less of an animal enclosure and more of a folly or stage set. It has lost its original purpose and its relationship with some of its setting and its significance is diminished by the infilling of the pit with concrete but still has high aesthetic and historic interest as a reminder of changing conservation practices within the zoo.

Eagle Aviary (Birds of Prey Aviary): A small but innovatively designed structure, this has high architectural interest for its unusual glulam structure and use of clean lines and innovative forms.

Guthrie Road Entrance Gates: The southern entrance with its curved flanking walls and Cast Iron gates is a well-preserved early element of the site from the 1850s, and has high historic interest. The

**Development Control Committee A – 26 April 2023**  
**Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

iron railings are good examples with high architectural interest even if now missing the original overthrow and accessories. This significance is recognised by their Grade II listing.

**(C) DOES THE DEVELOPMENT PRESERVE THE LISTED BUILDINGS, THEIR SETTING, OR ANY FEATURES OF SPECIAL ARCHITECTURAL OR HISTORICAL INTEREST WHICH THEY POSSESS?**

Entrance Lodges: The proposal ensures the long-term viability of the listed building through its proposals to convert it to a community focussed use (with a café). The physical works to the listed building are sensitive to its significance, and are limited to: breaking through an inner wall of the building that once formed the outer rear wall of the west pavilion, and adding a white-coloured vent to the 1933 rear gable of the eastern pavilion. The breaking through of the original fabric is restricted to a single doorway width which is necessary to allow a fully wheelchair-accessible toilet within the unisex toilet facilities, which are to occupy the existing ladies' toilets. Officers agree this represents a very low degree of harm that is justified, given the works are the minimum necessary to bring forward the proposed use, and is clearly outweighed by public benefit associated with the re-use of the building, including its provision of accessible toilets. This minor harm is therefore not a reason to resist the application, generally these proposed works would preserve the features of special architectural and historical interest the listed building possess.

Officers acknowledge within the assessment of the corresponding planning application that the setting of this listed building is harmed by the northern block proposed as part of the full planning application. However, this is not for consideration as part of the application for listed building consent, and the LPA has discharged the duties imposed by the Act in its consideration of the full planning application.

Giraffe House: The former Giraffe House is to be converted to a single-family home. To achieve this, the later, detracting, accretions relating to the gorilla occupation (large glazed and steel-framed enclosures) are to be stripped away from the north and east elevations. The gabled, oversize villa is essentially a shell filled with the structures to accommodate the gorillas. The proposals will install generously-scaled first and second floors, reinstating an elevation to the northern side of the building that has likely been missing since the creation of the Elephant House extension in 1938. Five new windows are to be installed into this elevation. The existing overscale openings are to have full-length glazing installed with the largest opening on the south-west elevation stretching from ground to first-floor level. Slate-grey framed windows are to be installed in the existing openings, which currently contain reinforced Perspex. A powder-coated aluminium balustrade in the same grey is to be installed across the second-floor hayloft opening on the south-west elevation. The existing doors, roof slates and stonework are to be repaired and refurbished. The existing five photovoltaics on the inner roof slope of the northern gable (on the north-west elevation) are to be updated with six, more efficient replacements. As with the adjacent lake houses, the newly created house will be accessed from the internal bonded-gravel driveway with a pergola-covered parking area and front garden and a rear garden on the lakeside. The proposed works would preserve the features of special architectural and historical interest the listed building possess, the removal of the various later accretions to the building are considered to represent an enhancement to the significance of this listed building.

Bear Pit: The proposed works seek to remove all of the unlisted aquarium extensions and structures including glazed lean-tos, structures, tanks and associated water features from the former Bear Pit. The original form of the structure is to be revealed with public access reinstated via the former steps. Public access will be possible onto the original octagonal platform with views into the refurbished central pit. The central pit, where the bear pole historically stood, is to be a designated location for

**Development Control Committee A – 26 April 2023****Application No. 22/02889/LA: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA**

public art, whether a single piece, changing installation or community opportunity. In this way, the bear pit structure is to have a function as well as public access. To facilitate this, railings are to be installed around the circular opening of the pit. The exact form of these railings is recommended to be secured by condition. The vaults beneath are to be accessible and maintained in use as a store with a new timber staircase from the French doors on the 'front' (west facing) elevation of the Bear Pit which is currently a decorative twentieth-century window lighting the aquarium beneath.

The bear pole, which is currently located near to the listed bear pit but excluded from the listing, would be retained directly adjacent to the former bear pit, retaining its information board. Whilst the bear pole is not a formally listed structure, retaining proximity to the bear pit improves the understanding of both it and the listed bear pit itself and retains historic interest in both elements.

The closing of the Zoo removed the active use of the former Bear Pit as an aquarium. The proposal appropriately addresses the harm associated with the cessation of use through incorporating it into the public open space and landscape proposal as an active feature, providing an optimal viable use. The removal of the later aquarium structures of limited historic interest will allow an appreciation of the scale, size and function of the pit and better reveal its significance. Restoring public access via the original steps to the platform is an additional substantial heritage benefit which will allow the structure to be experienced as intended, accessed via steps to a public platform looking into a central feature. The proposed works would preserve the features of special architectural and historical interest the listed building possess.

The proposal will introduce a large buildings to the north and east of the Bear Pit, which due to their scale and massing will negatively impact the setting of this listed building. However, this is not for consideration as part of the application for listed building consent, the LPA has discharged the duties imposed by the Act in its consideration of the full planning application.

Monkey Temple: The Monkey Temple today functions as a garden folly; an attractive if redundant former animal enclosure and feature focused on the concrete 'Temple' itself – its deep circular pit having been filled in with concrete. It is to a degree isolated from main pathways of the zoo with access up the main front steps restricted. Proposals under the full application proposed to reintegrate the folly into the public landscape. Works to the built fabric of the Monkey Temple are limited, including works to reopen access, the reinstatement of the historic Buddha statue, and the removal of detracting glazed additions to the rear of the Monkey Temple. The proposed works would preserve the features of special architectural and historical interest the listed building possess.

Eagle Aviary (Birds of Prey Aviary): The proposal seeks to remove the netting and meshes of the aviary to convert the building into a circular seating pavilion. The final detail of the seating is recommended to be determined by condition. The slim steel columns are to be refurbished and replaced only if structurally required. The blue mosaic-tiled base is to be restored where it has suffered damage and wear and tear.

The loss of use of the ongoing use of the aviary is mitigated through incorporating it into the public open space and landscape proposal as an active feature, providing an optimal viable use. The proposed works to the structure retain the significant elements. The proposed works would preserve the features of special architectural and historical interest the listed building possess.

Guthrie Road Entrance Gates: The listed gates are to be mechanised with a power and hydraulic supply system so that the pedestrian gates can be left open during daytime hours for pedestrian and cycle access and closed at night for mechanised access for pedestrians and cyclists. Additionally, the larger vehicle gates are to be mechanised to allow resident's car access into the site. The application also proposes refurbishment of the gates. Details of mechanisation are recommended to be secured by condition. The proposed works would preserve the features of special architectural and historical interest the listed gates and walls possess.

#### **(D) CONCLUSION AND RECOMMENDATION**

Overall, the proposal is considered to have an acceptable impact on the listed buildings.

**The application for listed building consent is recommended for approval subject to conditions. Delegated authority is sought to prepare the conditions in consultation with the Applicant. A list of expected conditions is included below, albeit the following list is not exhaustive:**

- Requirement to commence development within 18 months of the date of decision. The key reason for departing from the standard (3 years) commencement period relates to the need to avoid deterioration to the heritage values of the listed buildings, which a 3 year commencement period could allow.
- A condition to require the development to be carried out in accordance with the approved plans.
- A condition to require general details, including a method statement, of demolition works to all listed buildings in accordance with the approved plans.
- A condition to secure section details of the proposals, for example of new windows, doors etc.
- Conditions to secure details of materials, including sample panels.
- A condition to secure works proposed that constitute heritage benefits, including the removal of more recent accretions to the Giraffe House, Bear Pit, and Eagle Aviary.
- A condition to secure details of any extraction and ventilation equipment required to facilitate the Clifton Conservation Hub's kitchen.
- A condition to secure full details of the mechanisation works to the Guthrie Road Gates.
- A condition to secure final details of the railings proposed to the Bear Pit.
- A condition to secure details of the seating to be fitted to the Eagle Aviary.
- A condition to secure the recording of the historic buildings.

# Bristol Zoo Application Comments Summary

22/02889/LA

## **Appendix 1 - Contributor Comments**

DC Committee date 26<sup>th</sup> April 2023

### Notes:

- This document includes comments from contributors, including but not limited to statutory consultees, interest groups, and neighbour associations. For comments from neighbours and other members of the public, please see the document titled 'Neighbour Comments'.
- It has not been possible to include all figures, tables, or pictures included within the original comments within this document.

## **Index**

Conservation Advisory Panel 1 of 2 .....	3
Conservation Advisory Panel 2 of 2 .....	3
Historic Buildings And Places.....	6
Historic England 1 of 3.....	8
<b>Historic England 2 of 3.....</b>	<b>11</b>
<b>Historic England 3 of 3.....</b>	<b>13</b>
<b>The Twentieth Century Society 1 of 2 .....</b>	<b>13</b>
Twentieth Century Society 2 of 2 .....	15
<b>Urban Design and Conservation .....</b>	<b>16</b>
The Victorian Society 1 of 2 .....	25
<b>The Victorian Society 2 of 2 .....</b>	<b>26</b>



## Conservation Advisory Panel 1 of 2

Date: 5<sup>th</sup> July 2022

Commenter Type: Conservation Advisory Panel

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: It is acknowledged that the re-use and re-development of a facility that was originally developed and evolved over many years for a specific use is challenging. However, that does not mean that the scheme as proposed is acceptable. There is significant concern with the proposed quantum and scale of development, the poor quality of the architecture, the site layout and the adverse harm that would be caused to the character and appearance of this part of the Clifton and Hotwells Conservation Area and the setting of the listed buildings.

This is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over intensive with a consequential poor relationship with the adjacent School and its listed buildings. The north building at 6 storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular, the Bear Pit would be overly dominated by new development.

There are concerns with the impact on retained green infrastructure. Particularly with regard to the buildability of the quantum of development whilst retaining the specified trees. There are significant questions over the long term maintenance of the proposed public space. The gardens are a locally listed

heritage asset. The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site.

Consequently, it is considered that the proposal would neither sustain nor enhance the significance of relevant heritage assets including the Conservation Area and listed buildings within and without the site. It would provide insufficient substantial public benefit to outweigh the substantial harm caused by the impact of such a poor scheme on the relevant heritage assets. It is not considered that this scale of development can be justified in a heritage context. Moreover, it accords with neither the relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported.

## Conservation Advisory Panel 2 of 2

Date: 22<sup>nd</sup> November 2022

Overall Comment

It is acknowledged that the re-use and re-development of a facility, which was originally developed for a specific use and evolved over many years, is challenging. However, that does not mean that the scheme as proposed is acceptable. There is significant concern with the proposed quantum and scale of development, the poor quality of the architecture, the site layout and the substantial harm that would be caused to the character and appearance of this part of the Clifton and Hotwells

Page | 3

Conservation Area and the setting of the listed buildings. Not to mention the effective loss of an established, nationally recognised zoological facility and gardens.

#### Harm to overall historic interest and significance of site

The May 2022 Heritage Statement acknowledged the harm that is caused to the site and Conservation Area through the departure of the Zoo from its historic home, a point echoed by Historic England. The CAP disagrees that this harm is justified by the current proposal, and there is no evidence presented by the applicant that they have looked at alternative uses for the site, neither have BCC nor HE so far examined the business case that concludes that closure of the Zoo site and the change of use is necessary or inevitable. The significance and irreplaceability of the site as a whole is fundamental to this application. Bristol Zoo Gardens is the oldest one in the UK and the fifth oldest in the world. It has been open for 150 years. NPPF 189 states: 'These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'.

#### Loss of Communal Value

Defined as 'Value deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.' in English Heritage, Conservation Principles, 2008. At the public level, hundreds of thousands of people have visited the Zoo as children, as adults and with their own children for more than 150 years and the loss of this experience is not to be taken lightly. Additionally, the ashes of many people have been scattered within the herbaceous borders - to be lost under a roadway - while others have held weddings and celebrations in the Pavilion, which will be lost to flats. These memories and experiences - communal value - are  
Page 2 of 4

engraved in the psyche of thousands and will be lost or unavailable under this scheme. The communal value of this site cannot be underestimated and once lost will be gone forever.

#### Harm to listed buildings

The original and particular use of many of the buildings is integral to their historic significance and is cited as a key reason in the listing designations of the four animal houses on the site, justifying their listing at Grade II and their national importance. Harm to an asset of this significance should clearly be only as a last resort. The D&A statement refers to 'Historically significant buildings retained and sensitively converted to unique, environmentally sustainable homes'. But the CAP finds that such conversion would completely change the presentation and significance of these buildings, meaning the loss of: the Clifton Pavilion, Great Aviary/Parrot House, Giraffe House and the Museum/Activity Centre, all to apartments. It is not considered that the applicant has made the case for the level of harm proposed to the listed buildings within the site.

#### Justification of harm

It is recognised by the NPPF that new uses are sometimes needed for heritage assets to generate income for their long-term future. In order to do this, it may be necessary to cause some harm, but it is clear that in identifying the 'optimum viable use' for a heritage asset, the optimum viable use is one that causes the least harm to significance. The CAP argues that the proposed scheme would cause significant and irreversible harm and is not justified.

#### Alternatives

Page | 4

Other proposals for the site have been put forward either in broad outline or in detail and this suggests that other schemes are possible. Covid has provided a distraction so that disposal of the site is presented as a finished decision. But this is a nationally important site and time could usefully be taken to allow further time for ideas or to run a competition to determine its future.

While the governance of the Zoo is that of a limited company, it is also a charity with long-standing public responsibility. While it is acknowledged that the Trustees have fiduciary duty, the Objects of the Charity itself are to promote the public understanding and the conservation of wildlife and the natural environment and the scientific study of plants and animals. This housing estate proposal does not deliver either of these, while an alternative, perhaps in association with a body such as the Eden Project or the RHS, would do so.

#### Public amenity

Page 3 of 4

The proposed public access and maintenance of the gardens is to be funded by a levy on the residents. But there is insufficient evidence that this right will be granted in perpetuity as this access is permissive and could be modified or withdrawn. It is the prediction of many objectors to his scheme that the diverse, spontaneous visitors imagined in the D&A statement will not materialise; residents will object to funding a public amenity and in time it will become a private space. As presented, while pedestrian access is marginally improved, it is still tightly controlled and timed. The general perception and experience of the site will be as a gated community, not welcoming and few will cross town to go there.

#### Design

Even if there were no alternative to building densely on the site, the proposal is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over-intensive with a consequential poor relationship with the adjacent school and its listed buildings. The north building at six storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular the Bear Pit would be overly dominated by new development.

#### Landscape

Bristol Zoo Gardens are a locally listed heritage asset designated as a Local Historic Park/Garden and an Important Open Space. The Avon Gardens Trust has voiced concerns around the loss of trees, the viability of translocating other trees and hedges and the general impact on green infrastructure from ground and environmental disturbance during the long phases of works and the eventual overshadowing from tall buildings.

#### Cars and Parking

The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought not least as it creates another visual and psychological barrier for free pedestrian access to the green spaces within the site. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas

Page | 5

of on street parking throughout the site.

Conclusion

Page 4 of 4

As set out within Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council has a legal duty to have special regard to the desirability of protecting listed buildings and their settings, and also to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. This means that decision makers must give 'considerable importance and weight' to heritage issues when assessing an application. This has not been done in this instance.

The NPPF requires great weight to be given to the conservation of heritage assets. If there is substantial harm to or total loss of significance of a designated heritage asset, then permission should be refused unless the public benefits outweigh this level of harm, or the applicant can demonstrate that there are no other viable uses.

It is considered that the proposal would neither sustain nor enhance the significance of relevant heritage assets including the Conservation Area and listed buildings within and without the site. It would provide insufficient substantial public benefit to outweigh the substantial harm caused by the impact of such a poor scheme on the relevant heritage assets. It is not considered that this scale of development can be justified in a heritage context and the loss of the site as a public amenity is unacceptable. Furthermore, the applicant has not demonstrated that there are no other viable uses for the site. Consequently, the application does not accord with the applicable legislation, relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported.

BCC Conservation Advisory Panel

## Historic Buildings And Places

Date: 27<sup>th</sup> July 2022

FAO: Case Officer

Address: Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA

Application Ref: 22/02889/LA

Proposal: Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure. Works to listed building including: access-works to the Guthrie Road entrance gates; the conversion of the Entrance Lodge to facilitate community floorspace, the residential conversion of the Giraffe House, and various restoration and refurbishment works to the Aquarium (former Bear Pit), Monkey Temple, and Birds of Prey Aviary to secure their future as part of accessible landscaped gardens.

Statutory Remit: Historic Buildings & Places (HB&P) is the working name of the Ancient Monuments Society, a registered charity in England and Wales (no. 209605). We are a consultee on all Listed Building Consent applications involving an element of demolition, as required by the Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.

Page | 6

Comments: Thank you for consulting HB&P on this application. I apologise for the delay in responding. While the departure of the Zoo from this site will harm the overall historic and communal value of the Gardens, HB&P acknowledges that an element of residential development is acceptable to secure the future of the site. However, we do have concerns with some aspects of the application.

We welcome the proposals to retain the 'parkland' setting around the central lake as well as the removal of later unsympathetic accretions to the designated and local heritage assets, and their refurbishment as parkland follies and dwellings.

We agree that the location of the new apartment buildings is best located to the perimeter of the site, as proposed, however, their height and scale is excessive and harmful to the setting of the listed Zoo buildings and to the character of the conservation area. The existing buildings to be demolished are small scale and of different heights with spaces between each building, whereas the proposed buildings present a solid built form extending along each frontage, with little permeability beyond the formal entrances. The design and massing of these new buildings, particularly those on Guthrie Street opposite the listed Clifton College buildings, don't appear to fit well within the streetscapes of the conservation area, and at up to 6 stories, are too tall for the area. While not a listed building, the Art Deco clock building contributes to the story and development of the zoo over time. The roof extension is clumsy and doesn't respect the elongated proportions of the building, harming its appearance. Retaining it in its existing form would be preferable, and would provide a needed gap between the taller new buildings to either side.

While we don't oppose a modern architectural design, the design of the perimeter buildings should be reconsidered to better reflect the modulation, scale and rhythm of the neighbouring development to ensure the new development will contribute to and enhance the historic interest and significance of the conservation area.

Relevant NPPF (2021) policy considerations are:

- Paragraph 195: "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal".
- Paragraph 199: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation".
- Paragraph 200: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification."

Chapter 16 of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990 establish the requirements to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. I would be grateful if we could be informed of the outcome when this becomes available.

Regards

Ross Anthony

Page | 7

## Historic England 1 of 3

Date: 29<sup>th</sup> June 2022

Arrangements for Handling Heritage Applications Direction 2021 & T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

BRISTOL ZOO GARDENS GUTHRIE ROAD BRISTOL BS8 3HA

Application Nos 22/02889/LA & 22/02737/F

Thank you for your letters of 14 June 2022 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

### Summary

Generally, Historic England finds much to admire in the proposed development, which we feel on the whole is a sensitive response to its historic context. However, a considerable aspect of the site's significance is bound up in its continued use as a Zoo since the early 19th century, and its closure will have a pronounced harmful impact on the significance of the site.

The loss of the Zoo from the site is partially mitigated through good design, retention of much of the historic planting and landscape, and allowances made for future public access. There are some heritage benefits to the proposals, especially the removal of later accretions to the listed structures, and the restoration of those buildings.

There is room for improving the proposed design of the alterations to the art-deco café and the proposed building facing Guthrie Road, in order to preserve and enhance the character and appearance of the surrounding conservation area. We recommend you request revisions to these discrete aspects of the proposals prior to determination of the application.

While not directly related to this application, we note the recent Court Order quashing Planning Permission for residential development on the Zoo's West Car Park, outside the boundary of this application. We encourage your authority to consider how development proposals for the College Road site might be brought forward in conjunction with these plans.

### Significance

Bristol Zoological Gardens are the earliest provincial Zoo in England, having opened in 1836. The gardens, a locally-designated historic park, have been continually upgraded and adapted since opening, although the original design principles - a long terrace walk at the North side of the site, a large water feature in the centre, and exhibits in contained areas around the site perimeter - remain legible. The site is of considerable heritage significance.

The site is within the Clifton and Hotwells Conservation Area, and contains a number of Grade II listed buildings, some listed very recently following a review of the site by my colleagues in our listing team. The entrance lodges, south gate, and former giraffe house have long been listed. The bear pit, monkey temple and birds of prey aviary have recently also been listed at Grade II. There are a number of unlisted structures which make a positive contribution to the character and appearance of the conservation area, including the central pavilion, the forest of birds, the art-deco tearoom and the Clifton pavilion.

A great part of the Zoo site's significance is in its communal value; the meaning of the place for the people who relate to it, or for whom it figures in their collective experience or memory. These values are to a

degree associated with the attractive landscaped environment of the zoo but are perhaps more associated with the activity of the place, than its physical fabric.

There is, however, considerable aesthetic and historic value in the Zoo and its environs. It is an attractive garden landscape, the original early 19th century layout of which is still discernible. The high boundary walls, diverse architecture and lush, verdant character of the planting make for a site of insular character that is markedly different from the surrounding upmarket suburbs of Clifton.

### Impact

In considering proposals for the redevelopment of the site, the great challenge is how the character of the site could be preserved and enhanced once its *raison d'être* - the animals - have departed.

The Zoo would close, and its operations would transfer to the existing satellite operation of Bristol Zoo at the Wild Place, near Cribbs Causeway. The entire site would be repurposed as a new residential enclave, with the majority of the existing gardens retained and provision made for public access. The Zoo would retain a small education offering on the site in the existing gatelodges and reception building, which would be repurposed as the "Clifton Conservation hub".

A series of residential buildings would be constructed around the perimeter of the site, mainly in areas presently occupied by animal enclosures. We are encouraged by the approach taken to the design of these proposed buildings. They are simple in form, but carefully modulated to avoid large unrelieved elevations. Their proposed elevations strike a balance between preserving the inward-looking, walled character of the Zoo site, and providing visual interest and engagement with the surrounding streets.

The proposed buildings would be built of buff brick with deep punched openings, and a rusticated feel at lower levels referencing the existing random rubble perimeter walls. At upper levels a smoother texture would be used. Planting would be designed into the buildings to soften their appearance and acknowledge the green character of the site and the Downs, opposite. Playful decorative motifs - animal imagery in tiled motifs and fret-cut metalwork - would be applied to reference the site's previous use.

The scale and massing of the proposed new buildings is generally an appropriate response to the historic context. They would not significantly exceed the height set by the established surrounding townscape. The proposed apartment block facing Guthrie Road differs from the rest of the new-build accommodation in that it will have a frontage that addresses the surrounding roads. It is opposite the Grade II\* listed Clifton College buildings, and there needs to be a balance between a building which is clearly part of the family of new buildings but also integrates with the surroundings. This building would benefit from further refinement to break its massing and perhaps to better reference the characteristic defined bay rhythms of the surrounding buildings.

A series of new-build houses would be constructed around the southern edge of the lake, and adjacent to the forest of birds. In contrast to the subtle design of the perimeter blocks, these would be of a more flamboyant aesthetic with steeply-pitched roofs, eye-catching materials, and feature large windows which draw upon the large openings of the listed former giraffe house for architectural reference. The energetic architecture of the proposed new-build houses is, in our view, an appropriate response to the 'otherworldly' character of the Zoo site.

Existing buildings within the site would be converted, where possible, to residential use. The existing central pavilion/former museum would be sensitively adapted, with modern accretions removed. A

similarly sensitive restoration and conversion would be undertaken at the Forest of Birds and the Clifton pavilion and we endorse this approach, which will preserve the historic buildings and provide them with a beneficial use.

It is proposed to adapt and extend the art-deco cafeteria building, removing its rather sprawling later 20th century extensions but adding a two-storey rooftop extension. We feel the proposed two-storey rooftop extension would rather overwhelm the architecture of the existing building and recommend that this element of the design is revised. A single-storey upward extension here is likely to allow the aesthetic of the existing building to remain uncompromised, whereas the present proposal for two additional storeys would, we feel, have a harmful impact.

Unsympathetic extensions would be removed from the listed former bearpit, and it would act as a viewing platform for site visitors. The listed birds of prey aviary would be adapted as a seating area. The monkey temple would be restored and continue to act as an attractive landscape folly. We are pleased to support these aspects of the proposals.

We regret the need for vehicles to enter the site post-redevelopment. Part of the site's character is derived from its traffic-free environs, and the movement of vehicles and surface car parking will be a detracting influence. While the majority of car parking is accommodated in undercroft areas and car ports, a small number of surface car parking areas are proposed. Great care will be needed in the design of shared-surface streets to prevent ad-hoc parking of vehicles and ensure the ability of pedestrians to promenade around the site is undiminished.

The ability for visitors to enter the site, free of charge, post-redevelopment, is a significant heritage benefit. We understand that maintenance of the gardens will be funded through a service charge on new residents; a necessary feature given the high-maintenance nature of the Zoo landscaping. We would expect your authority to secure this public access through legal agreement, should you be minded to recommend approval of this planning application.

It is important that users of the gardens and new residents are able to understand and interpret the history of the site. Details of an interpretation strategy should be the subject of a planning condition on any approval. We would encourage an imaginative response to the interpretation of the site in discussion with other partners and stakeholders.

#### Policy

The closure of the Zoo will cause some harm to the character and appearance of the Clifton and Hotwells Conservation Area. That harm is less than substantial, but you should not immediately proceed to the "balancing exercise" of weighing benefits versus harm.

The National Planning Policy Framework (NPPF) is very clear on this. Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, or less than substantial harm to its significance. Paragraph 200 goes on to advise that any harm to the significance of a designated heritage asset should require clear and convincing justification.

In other words, if there is a means by which the benefits of the scheme can be realised while lessening the harm to the historic environment (or potentially avoiding harm altogether), the justification is not clear and convincing.



We consider that relatively minor design changes are needed to the café extension and the Guthrie Road building. If these amendments were secured, we may be in a position to acknowledge that the harm has been minimised as far as possible, which could then allow you to proceed to the balancing exercise set out under NPPF paragraph 202.

NPPF paragraph 206 is also of relevance to these proposals, stating that “Local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

While the impact of the Zoo closure on the conservation area is harmful, we consider that the detailed proposals for the individual heritage assets within the Zoo site will enhance, and better reveal, their significance. With the minor adjustments to the scheme as suggested above, the scheme has the potential to comply with NPPF paragraph 206.

#### Position

Revisions to the design of the café extension and the Guthrie Road building could allow Historic England to support these proposals. We are not in that position yet, however, and have some concerns over the impact of the proposals on the character and appearance of the Clifton and Hotwells Conservation Area. We understand the Zoo’s intention to secure planning permission and sell their site with an extant consent. Our potential support is based upon the development being executed in accordance with the presented vision, and the possibility of a later exercise in value engineering should be avoided at all costs.

#### Recommendation

Historic England has concerns regarding the applications on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 199, 200 and 206 of the NPPF.

Yours sincerely

Simon Hickman

Principal Inspector of Historic Buildings and Areas

Historic England 2 of 3

Date: 24th November 2022

Arrangements for Handling Heritage Applications Direction 2021 & T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990  
BRISTOL ZOO GARDENS GUTHRIE ROAD BRISTOL BS8 3HA Application Nos 22/02889/LA & 22/02737/F

Thank you for consulting Historic England on amendments to the listed building consent and planning applications to redevelop the site of Bristol Zoo, Clifton, for residential purposes. On the basis of this information, we offer the following advice to assist your authority in determining the applications.

Our previous advice We wrote to you on 14 June 2022 in response to the original submissions. We advised that while we generally found the proposals to be a sensitive response to their historic context, a

Page | 11

considerable aspect of the site's significance is bound up in its continued use as a Zoo since the early 19th century. The closure will have a pronounced harmful impact on the significance of the site. We advised that the loss of the Zoo from the site is partially mitigated through good design, retention of much of the historic planting and landscape, and allowances made for future public access. There are some heritage benefits to the proposals, especially the removal of later accretions to the listed structures, and the restoration of those buildings. We advised that there was room for improving the proposed design of the upward extension to the clock tower building and the façade of the proposed building facing Guthrie Road, in order to preserve and enhance the character and appearance of the surrounding conservation area. These amendments respond to those comments.

#### The amended proposals

The amended proposals for the clock tower building would see the proposed rooftop extension reduced from two storeys to one. We felt the previous proposals for a twostorey rooftop extension would overwhelm the architecture of the existing building beneath. The revised proposed for a single-storey upward extension now allows the aesthetic of the existing building to remain uncompromised and addresses our previous concerns.

We expressed reservations about the design of the proposed building fronting Guthrie Road in our previous advice. This building will have a frontage that addresses the surrounding roads. It is opposite the Grade II\* listed Clifton College buildings. We suggested that this building would benefit from further refinement to break its massing better reference the characteristic bay rhythms of the surrounding buildings.

In response to our comments, the design of the proposed Guthrie Road building has been revised. A defined bay rhythm has been introduced to the Guthrie Road elevation of the proposed building, which in our view successfully references the character of surrounding properties. We feel the revised proposals address the need to strike a balance between a building which is clearly part of the family of new buildings on the Zoo site, but also integrates with the conservation area context of surrounding streets.

The proposed building fronting the Northern boundary of the site has been revised in elevation. We did not make detailed comments on this building in our previous advice and do not propose to here, other than to record that the proposed amendments are an improvement when compared against the previous scheme.

In response to comments raised by other stakeholders, it is now proposed to make adjustments to the boundary wall at the North East corner of the site to encourage public access and increase visual permeability. While we have previously advised that the inward-looking character of the site with its solid perimeter wall is an important aspect of its character, we understand the desire to make the site more permeable. We feel the revised proposals balance the preservation of a walled perimeter with the desire to invite users to enter the site, and do not oppose these revised proposals.

#### The planning balance

The proposals will still cause harm to the character and appearance of the Hotwells and Clifton Conservation Area. A significant part of that harm is derived from the loss of the Zoo from the site, which it appears cannot be avoided as the site is no longer compatible with modern standards of animal welfare.

The introduction of vehicular traffic into the site will have a marked adverse impact on its character and appearance. As we have noted previously, the traffic-free nature of the gardens contributes to their tranquillity and sense of “otherworldliness”. You will need to be satisfied that vehicle movements have been kept to the absolute minimum necessary to service the proposed accommodation.

The site is not allocated in the statutory local plan, and as such your authority will need to carefully consider both the principle of residential development and the quantum of new homes. If you consider both the principle and quantum acceptable, our view is that the harm has been mitigated as far as possible through good design.

This allows you to proceed to the “planning balance” of weighing the less than substantial harm to the character and appearance of the conservation area against any wider public benefit offered by the proposals, in accordance with National Planning Policy Framework paragraph 202.

There are a number of heritage benefits associated with the proposals which should be considered alongside any wider public benefits. These include the retention and restoration of all the listed structures within the site, and the provision of free public access to the retained garden areas. We continue to encourage your authority to secure this public access through legal agreement, should you be minded to recommend approval of these applications.

As per our previous advice, we also recommend that details of a strategy to interpret and understand the history of the site should be subject to an appropriately worded planning condition, if you are minded to recommend approval.

#### Recommendation

Historic England has no objection to the applications on heritage grounds. Your authority should take these representations into account in determining the applications. If there are any material changes to the proposals, or you would like further advice, please contact us.

Please advise us of the decision in due course. Yours sincerely Simon Hickman Principal Inspector of Historic Buildings and Areas

#### Historic England 3 of 3

Date: 1<sup>st</sup> February 2023

Thank you for your letter of 17 January 2023 regarding further information on the above application for planning permission. The additional information on which you have consulted us consists of additional justification for the proposals, mainly in response to comments made by other interested parties. There are also minor amendments to blocks E1, E2, and E3, in order to address concerns about overlooking. The additional information and minor amendments have no material bearing on the advice which we have previously given. I therefore refer you to our previous letter of 23 November 2022 (our reference L01508753), the comments of which still stand.

Yours sincerely Simon Hickman Principal Inspector of Historic Buildings and Areas

#### The Twentieth Century Society 1 of 2

Date: 8<sup>th</sup> August 2022

Dear Matthew Blunt

Page | 13

Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA

The Twentieth Century Society has been notified of the above application for 'Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure.' There are a number of designated and non-designated heritage assets on the site and it is located within the Clifton and Hotwells Conservation Area.

Site

Bristol Zoological Gardens was founded by The Bristol, Clifton, and West of England Zoological Society and opened in 1836. Much of the heritage, built and landscaped, on the site dates from the 19th century and we defer to the Victorian Society for comment on the impact the proposed scheme would have on this work.

Of interest to the Society is the work carried out from the early 20th century, particularly the Monkey Temple (1928), the Clifton Pavilion (1930), the Clock Tower Building (Hide Restaurant/Bug World) (1938-), the Birds of Prey Aviary (1962), and the Terrace Theatre (2003).

Policy

The Monkey Temple and Birds of Prey Aviary were designated Grade II in 2022.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority [...] 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." The zoo is also located within the Clifton and Hotwells Conservation Area. Section 72 requests that local authorities pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework (NPPF, 2021) includes paragraph 199 which states that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation [...] This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Paragraph 200 states that any harm to, or loss of, significance should require clear and convincing justification. –

The Clifton Pavilion is locally listed and the Clock Tower Building and Terrace Theatre are unlisted but should be treated as non-designated heritage assets on account of their architectural and historic interest. The NPPF states that local authorities should take into account desirability of conserving heritage assets and putting them to viable uses consistent with their conservation for the benefit of communities (paragraphs 189 and 197). Paragraph 203 asks local authorities to consider the effect of an application on the significance of NDHAs.

Proposals

The Bristol, Clifton & West of England Zoological Society has announced that the zoo will close from September 2022 and the site adapted and developed for residential use with a 'Clifton Conservation Hub' for educational use. We understand that the zoo intends to sell the site with consent in place for the scheme. Our assessment responds to the proposals in their current form, as presented in the submitted documents.

Our Assessment

The Society has no objections to the majority of the work proposed to the 20th-century buildings and enclosures on the site. We do not take issue with the proposed reuse of

Page | 14

the Grade II Birds of Prey Aviary as a seating area, and we support plans to restore the Grade II Monkey Temple as a garden folly. We are pleased that the Terrace Theatre (2003) will be retained as a community facility. When we first reviewed the application, we were concerned about the proposed two-storey zinc tile-clad rooftop extension to the 1930s Clock Tower Building which we felt would have a detrimental impact on the building. The architects have now revised and improved the design and, as such, we do not wish to comment on this aspect of the scheme.

We hope that these comments are of use to you. We would be grateful if you could please notify us of your decision on this application.

Yours sincerely,

Coco Whittaker

Caseworker

The Twentieth Century Society

Twentieth Century Society 2 of 2

Date: 5<sup>th</sup> August 2022

05 August 2022

Dear Case Officer

Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA

The Twentieth Century Society has been notified of the above application for 'Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure.' There are a number of designated and non-designated heritage assets on the site and it is located within the Clifton and Hotwells Conservation Area.

#### Site

Bristol Zoological Gardens was founded by The Bristol, Clifton, and West of England Zoological Society and opened in 1836. Much of the heritage, built and landscaped, on the site dates from the 19th century and we defer to the Victorian Society for comment on the impact the proposed scheme would have on this work.

Of interest to the Society is the work carried out from the early 20th century, particularly the Monkey Temple (1928), the Clifton Pavilion (1930), the Clock Tower Building (Hide Restaurant/Bug World) (1938-), the Birds of Prey Aviary (1962), and the Terrace Theatre (2003).

#### Policy

The Monkey Temple and Birds of Prey Aviary were designated Grade II in 2022. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority [...] 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." The zoo is also located within the Clifton and Hotwells Conservation Area. Section 72 requests that local authorities pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework (NPPF, 2021) includes paragraph 199 which states that "When considering the

Page | 15

impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation [...]This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Paragraph 200 states that any harm to, or loss of, significance should require clear and convincing justification. –

The Clifton Pavilion is locally listed and the Clock Tower Building and Terrace Theatre are unlisted but should be treated as non-designated heritage assets on account of their architectural and historic interest. The NPPF states that local authorities should take into account desirability of conserving heritage assets and putting them to viable uses consistent with their conservation for the benefit of communities (paragraphs 189 and 197). Paragraph 203 asks local authorities to consider the effect of an application on the significance of NDHAs.

#### Proposals

The Bristol, Clifton & West of England Zoological Society has announced that the zoo will close from September 2022 and the site adapted and developed for residential use with a 'Clifton Conservation Hub' for educational use. We understand that the zoo intends to sell the site with consent in place for the scheme. Our assessment responds to the proposals in their current form, as presented in the submitted documents.

#### Our Assessment

The Society has no objections to the majority of the work proposed to the 20th-century buildings and enclosures on the site. We do not take issue with the proposed reuse of the Grade II Birds of Prey Aviary as a seating area, and we support plans to restore the Grade II Monkey Temple as a garden folly. We are pleased that the Terrace Theatre (2003) will be retained as a community facility. When we first reviewed the application, we were concerned about the proposed two-storey zinc tile-clad rooftop extension to the 1930s Clock Tower Building which we felt would have a detrimental impact on the building. The architects have now revised and improved the design and, as such, we do not wish to comment on this aspect of the scheme.

We hope that these comments are of use to you. We would be grateful if you could please notify us of your decision on this application.

Yours sincerely,

Coco Whittaker

Caseworker

The Twentieth Century Society

#### Urban Design and Conservation

Date: 02/03/2023

Application: 22/02737/F & 22/02889/LA Bristol Zoological Gardens

#### Summary:

Bristol Zoo is one of the earliest provincial zoos in the world and is consequently a highly significant heritage site.

The relocation of the zoo to enable greater focus on its valuable conservation work is recognised.

The proposals include heritage gains including improvements to the site boundaries and adaptive reuse of designated and non-designated heritage assets.

However, the proposed new residential units within the site and the scale and massing of apartment blocks around the perimeter of the site lead to less than substantial harm (NPPF, paragraph 202) to the significance of the Clifton and Hotwells Conservation Area and setting of listed buildings within and around the site.

Clear and convincing justification for any harm to the significance of heritage assets is required in accordance with paragraph 200 of the NPPF. The applicant has stated that the level of harm caused by the scale, massing and general quantum of the proposed development is required to ensure the delivery of the heritage gains and public benefits of the scheme.

Revised plans and documents were submitted in late October/early November 2022, the Planning Statement and Design and Access Statement explains the key changes made. These comments respond to those submissions. A Vu.City model has also been provided, any views that have been relied upon when making these comments are included within the document.

#### Heritage assessment:

The site and its contents are subject to a number of local and national designations with regard to historical and cultural significance, including:

Local Historic Park and Garden – the site

Clifton and Hotwells Conservation Area (within)

The Downs Conservation Area (immediately to the north)

#### Listed buildings:

Bristol Zoological Gardens entrance (Grade II), north west corner of site

Giraffe House (Grade II), south eastern side

South entrance gates and flanking walls, Gurthrie Road

Clifton College, various Grade II and Grade II\* listed buildings (to the south)

Bear Pit (Grade II), within the site

Monkey Temple (Grade II), within the site

Eagle Aviary (Grade II), within the site

#### Locally listed building:

The Clifton Pavilion (west side of site, facing College Road)

Clifton Music School (southern tip at junction of College Road and Guthrie Road)

Clifton College Preparatory School (north east)

Houses on Clifton Down (to the west)

#### Significance (NPPF, paragraph 194/5)

Bristol Zoological Gardens opened in 1836 and is predated only by Paris, London and Dublin zoos.

Features from the original design of the zoo survive including the entrance lodges (listed grade II), the former bear pit (listed grade II) and terrace promenade.

Later features of the zoo landscape are also surviving nationally important heritage assets such as the former giraffe house (listed grade II), monkey temple (listed grade II), Guthrie Road entrance gates (listed grade II) and eagle aviary (listed grade II).

The zoo and its landscape make a positive contribution to the character and appearance of the Clifton and Hotwells Conservation Area, it is a locally designated historic park and garden and contains the locally listed Clifton Pavilion. The zoological gardens have been an important cultural asset for the city for nearly 200 years with multiple generations enjoying visits to both the animals and high-quality planted landscape. Consequently, the site has immense communal value in addition to the demonstrable architectural, aesthetic and historic values.

This significance is recognised by the applicant in their heritage assessment and has informed aspects of the proposals such as the reuse of the entrance lodges, bear pit, monkey temple, eagle aviary, Clifton Pavilion.

Assessment of impact (NPPF, paragraphs 199-204):

The relocation of the zoo poses many challenges particularly where there are so many important aspects to the site as summarised above. The proposal offers opportunities particularly where the practical necessities of running a zoological garden in a residential neighbourhood have led to parts of the site making a neutral or negative contribution to the character and appearance of the conservation area. The boundaries to the site, particular along Northcote Road on the east side of the site and in the middle section of the College Road boundary are proposed to be improved through this development offering an enhancement to these aspects of the conservation area.

The retention and reuse of numerous assets within the site; entrance lodges, bearpit, monkey temple, eagle aviary, giraffe house, Clifton Pavilion and the approach to the listed Guthrie Road entrance are welcomed as heritage gains. Similarly, the free public access proposed to the gardens between the hours of 8am and 5pm represents a heritage benefit, given it will increase public interaction with a number of heritage assets within the site.

Despite these gains the proposals will cause a degree of less than substantial harm to the character and appearance of the conservation area and setting of heritage assets within and around the site. This harm will be caused by the scale and massing of the perimeter residential blocks and the introduction of residential dwellings within the historic landscape.

This part of the Clifton and Hotwells Conservation Area is predominantly characterised by large Victorian residential villas that front Clifton and Durdham Downs and surrounding streets as recognised by Panoramic View 21 in the Character Appraisal. The type of large residential apartment blocks proposed for the zoo (as demonstrated in view 1 of the appendices) will consequently differ from this character and not preserve or enhance the character and appearance of the conservation area as required by the Act (Town and Country Planning (Listed Buildings and Conservation Areas) Act, 1990).

The block on the northern boundary also harms the setting of the listed entrance lodges as demonstrated in view 2 of the appendices where the current significance of the entrance lodges includes their visual dominance in the landscape despite their low architectural form.

The applicant has introduced some design changes to the scheme in light of previous comments. These have helped reduce the impact, however, introducing greater void (windows) to solid (wall) ratios and/or greater (deeper) recesses in the areas of the circulation cores particularly with the block on the northern boundary would help to break down the massing and create a more villa type appearance thereby reducing the level of harm.

The scale and massing of the other blocks around the site also causes less than substantial harm to the character and appearance of the conservation area and setting of listed buildings such as the listed Clifton College buildings on Guthrie Road as demonstrated in views at the junction of Northcote Road looking towards College Road (Local Views 26, Character Appraisal and view 3 of the appendices).

The impact on the setting of the Clifton College heritage assets is reduced in views from the south, such as from the cricket pitch, where only a slight if any impact is visible in views such as view 4 of the appendices (Long View 25, Character Appraisal).



The proposed 'lake house' villas within the zoo landscape are architecturally interesting buildings that complement the design aesthetic of the retained zoo buildings. However, by introducing private residential dwellings to what is currently a quality landscape that is perceived as public will cause cumulative harm to the conservation area and local historic park and garden. This harm will be caused by the introduction of vehicular movement and car parking to what is currently a largely vehicle free landscape. These private dwellings and their associated aspects will change the perception from being a public to a private landscape impacting the communal value of the site as well as the landscape qualities. This will be particularly evident when looking into the site from College Road (view 5 of the appendices, also identified as Local View 21 in the Character Appraisal) where the landscape will appear to be a private residential street as opposed to a public historic landscape.

The proposed northern block will not materially harm the significance of the Downs Conservation Area due to the topography of Downs and the screening provided by the existing trees.

#### Urban Design:

The height, scale and massing of the development has been assessed in relation to heritage assets and the character of the area, the harm associated with this has been discussed contrary to policy DM26 and 27. The layout directs the majority of the development to the site's edges reinforcing the 'walled' character of the site. With regard to policy DM28, the development will create a safe, attractive, high quality, inclusive and eligible public realm, both within and outside of the site. As distinct new part of Clifton, the new buildings as proposed will introduce high quality materials to the townscape in accordance with policy DM29.

#### Conclusion:

Clear and convincing justification for any harm to the significance of heritage assets is required in accordance with paragraph 200 of the NPPF. The applicant has stated that the level of harm caused by the scale, massing and general quantum of the proposed development is required to ensure the delivery of the heritage gains and public benefits of the scheme. These heritage gains include the retention and reuse of the various heritage assets (designated and non-designated) and enhancement to aspects of the conservation area as detailed above.

Public benefits provided by this scheme that can contribute to the planning balance as defined by paragraph 202 of the NPPF include; free public access to the gardens and a cultural strategy that will encourage greater community use of the assets. Planning conditions and agreements will be required to secure these benefits should this proposed development receive consent.

Archaeological conditions to secure the recording of the heritage assets prior to and during the development works will also be required in accordance with paragraph 205 of the NPPF and Supplementary Planning Document 7. This should include the pre-commencement condition to secure an archaeological programme of works and historic building recording and watching brief conditions.

View 1



Page 778

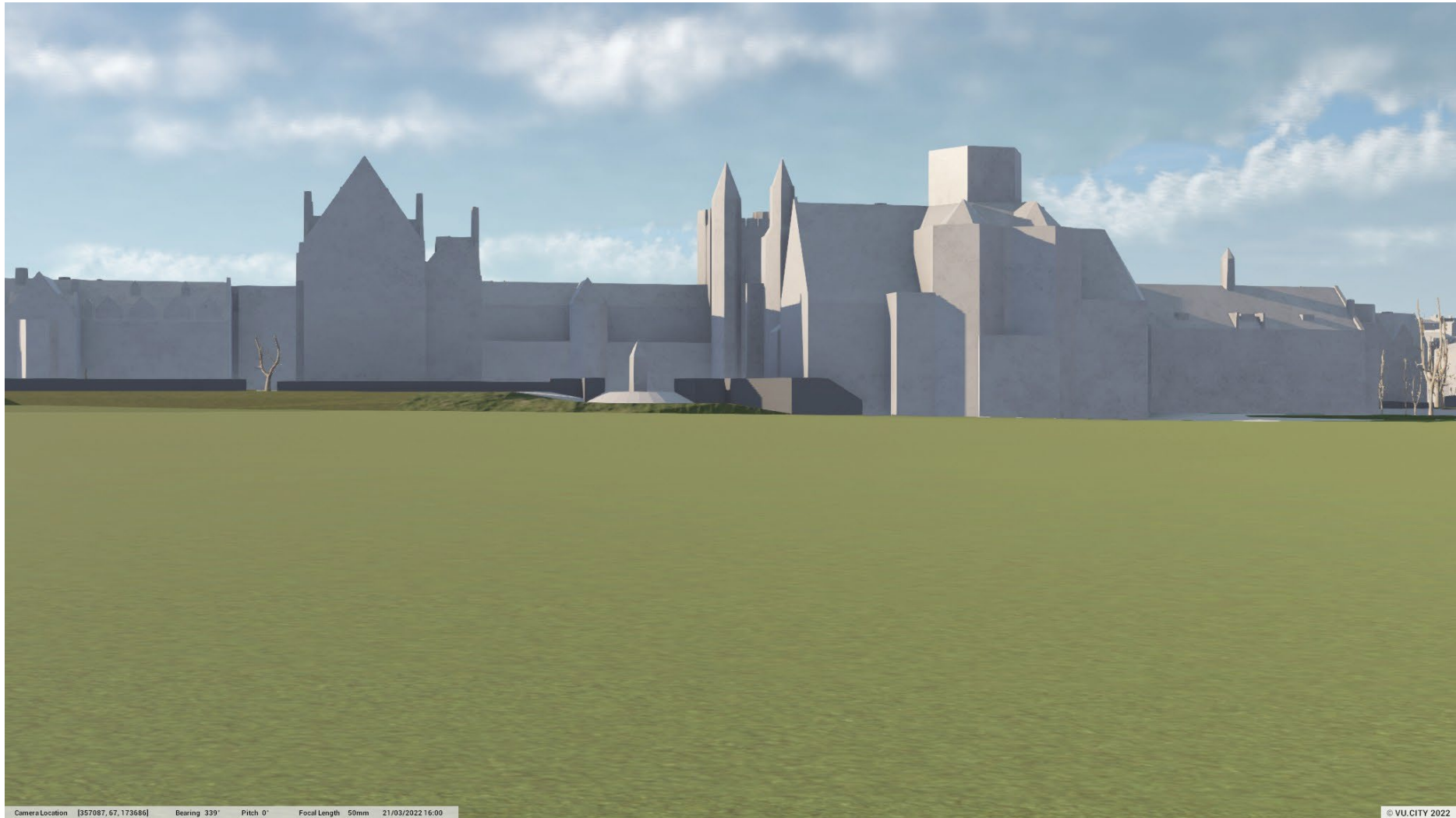
View 2



View 3



View 4



Page 781

Camera Location [357087, 67, 173686] Bearing 339° Pitch 0° Focal Length 50mm 21/03/2022 16:00

© VU.CITY 2022

View 5



Page 782

## The Victorian Society 1 of 2

Date: 22nd July 2022

Dear Case Officer,

RE: 22/02889/LA | Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure. Works to listed building including: access-works to the Guthrie Road entrance gates; the conversion of the Entrance Lodge to facilitate community floorspace, the residential conversion of the Giraffe House, and various restoration and refurbishment works to the Aquarium (former Bear Pit), Monkey Temple, and Birds of Prey Aviary to secure their future as part of accessible landscaped gardens. | Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

Thank you for consulting the Victorian Society on this application. It was presented to the Society's Southern Buildings Committee, a group of architects, historians and heritage professionals. Following its advice we write to make this objection.

Bristol Zoological Gardens is a site of high architectural and historical significance. The fifth zoo to open in Europe, it is one of only three remaining 1830s zoological gardens in the British Isles. Its rarity as an early example of this type of landscape, its surviving historic zoological buildings, and continued use for its original purpose make it extremely significant. Furthermore, its place within the Clifton Conservation Area and relationship to nearby listed buildings mean that the Gardens are very sensitive and significant alteration is likely to cause a degree of harm not just to the Gardens themselves, but to the Conservation Area and nearby heritage assets.

The Victorian Society understands Bristol Zoological Society's desire to vacate the Gardens and we acknowledge that the principle of some degree of residential development could be acceptable. Irrespective of any future redevelopment, however, the departure of the zoo from the site will seriously harm the historic significance of the Gardens. We are also concerned by aspects of the design of the proposals.

Bristol Zoological Gardens is characterised by its low density, small scale, historic (listed) buildings, situated within a mature landscape, contained within a perimeter wall. This means that although the Gardens retain a discreet character of their own, distinct from the surrounding Conservation Area, they nonetheless make a positive contribution as an oasis within the surrounding built environment. The zoo does not compete with the neighbouring buildings for prominence, and it succeeds in preserving an openness towards the Downs. Importantly, despite alteration since opening in 1836, the site remains legible as a historic 19th century Zoological Gardens within a wider 19th century locality, something, as noted above, which is exceptionally unusual and significant.

The proposed development would seriously harm the significance and character of the site and the Conservation Area. The density and height of the new buildings would represent a gross overdevelopment and erode the character and legibility of the historic landscape. The height of the buildings around the perimeter of the site mean that the gardens would be cut off completely from the surrounding Conservation Area, effectively turning them into gardens for the benefit of the new development, rather than the wider locality. The height of the buildings would also harm the Conservation Area and nearby listed buildings by introducing a scale, form and architectural idiom at odds with the Conservation Area. The new buildings would compete with the listed Clifton College and the nearby 19th century housing, diminishing their prominence. They would also destroy any impression of openness linking the site to the Downs. These effects would be heightened by the lack of significant gaps between the proposed buildings, especially those to the north west and north east. Any acceptable proposal would be of a lower scale and density, better preserving the Garden's character and positive contribution to the Conservation Area.

Ultimately, this gives rise to the concern that the proposed development is not informed by a full understanding of the history and character of the site. Surviving zoological gardens of the 1830s are very rare and it is important that proper study of the site is undertaken to identify which parts of the original design survive. Any proposals must be based on these findings and seek to enhance and sustain this significance, ensuring that the gardens remain a heritage asset which can be fully appreciated by the public.

The NPPF is clear that it is desirable to 'sustain and enhance' the significance of heritage assets (para 190a), and that 'great weight should be given to the asset's conservation' (para 199). Furthermore, that 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.' (para 206). This proposal would not enhance or better reveal the significance of the site and nearby heritage assets. The Victorian Society objects to the proposal in its current form.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

Connor McNeill

Conservation Adviser

The Victorian Society 2 of 2

Date: 27th January 2023

Thank you for consulting the Victorian Society on amendments to the original proposals for the redevelopment of Bristol Zoological Gardens. However, having reviewed the latest documentation our objection remains. In our previous objection we drew attention to the site's high significance as one of Europe's earliest zoological gardens, and one which continues in this use. Furthermore, we highlighted the important role it plays in contributing to the significance of the Clifton Conservation Area and the setting of nearby designated and non-designated heritage assets. The proposals which would see the site adapted to a new use, with a quantum of development alien to the character of the site and the Conservation Area, would cause serious harm to significance as outlined in our previous consultation response. The amendments which comprise of minor design changes do not address these concerns and the proposals remain substantially as first presented. Our serious concerns about the harm the scheme would cause to the significance of the site, Conservation Area and nearby designated and non-designated assets remain. The NPPF is clear that it is desirable to 'sustain and enhance' the significance of heritage assets (para 190a), and that 'great weight should be given to the asset's conservation' (para 199). Furthermore, that 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.' (para 206). The amended proposals do not ensure this, and the Victorian Society maintains its objection to the proposals. Connor McNeill Conservation Adviser Direct line 020 8747 5893 [connor@victoriansociety.org.uk](mailto:connor@victoriansociety.org.uk) Your reference: 22/02737/F Our reference: 180526 26th January 2023 [development.management@bristol.gov.uk](mailto:development.management@bristol.gov.uk) I would be grateful if you could inform me of your decision in due course.

Yours sincerely, Connor McNeill Conservation Adviser



END OF DOCUMENT

# Zoo Application Comments Summary

22/02889/LA

## Appendix 2 - Neighbour Comments

DC Committee date 26<sup>th</sup> April 2023

### Notes:

- This document includes comments from neighbours and other members of the public. For comments from stakeholders such as statutory consultees, internal contributors, interest groups, and neighbour associations, please see Appendix 1 'Contributor Comments'.
- Some comments included within this document are duplicates, meaning this document exaggerates the number of comments received in response to this application. As explained within the Committee Report, in total, 24 objections and 1 support comment have been received (as of 17.04.23).
- It has not been possible to include all figures, tables, or pictures included within the original comments within this document.

## **Index**

<b>First consultation phase</b> .....	
<b>15<sup>th</sup> June 2022 – 6<sup>th</sup> November 2022</b> .....	<b>3</b>
<b>Second consultation phase</b> .....	
<b>7<sup>th</sup> November 2022 – 15<sup>th</sup> January 2023</b> .....	<b>12</b>
<b>Third consultation phase</b> .....	
<b>16<sup>th</sup> January 2023 – 17<sup>th</sup> April 2023</b> .....	<b>20</b>

## First consultation phase

15<sup>th</sup> June 2022 – 6<sup>th</sup> November 2022

STANCE	COMMENTS	DATE RECEIVED
1. O	I'm a parent at Clifton College and I'm very concerned about parking and the use of the zoo carpark which is currently available to the school community. Another 200 new build homes is not what this densely built up area of Clifton needs! Let the site become something of value to the community, for education about the natural world and environmental education. surely affordable housing can go elsewhere not in this historical site.	15-Jun-22
2. O	As a local resident I am concerned about the effect of the residential development of the Zoo Site. Clifton as a whole is already running low on space for existing households. In particular the issue of parking for cars. 201 extra household will invariably mean a significant increase in the number of cars. Either 201 parking spaces (an undesirable idea) will need to be provided or residents will end up parking their cars in surrounding streets which are already very full. The aesthetic of the area also must be considered. There are several examples of unsympathetic development throughout the Conservation Area already. It is of course impractical to demolish them. The Zoo site should not become another of these unsympathetic developments. The aesthetic of the area is integral to what makes Clifton a unique part of Bristol. The style of many of the proposed buildings do not fit the style of other residential properties in the area. I am also concerned that some of the buildings are too tall. Many of the buildings in the surrounding area are harmonious in height. The number of stories ought to be reconsidered to fit in better with the surrounding buildings. In summary I feel that the redevelopment of the Zoo site ought to be a purely community focused project. The residential plans ought to be scaled back significantly, if not entirely removed. The redevelopment of such a historically important site should not be seen as a financial opportunity but a preservation project. Preserve the integrity of the local area and the history of the site.	15-Jun-22

3. O	<p>I would like to make it clear that the majority of the opposition to the current development plans have nothing to do with neighbours being 'entitled'. The Zoo site is in a Conservation area, that does not mean new housing cannot be built, it means that developers need to have sensitivity when designing the housing. Building styles that are incongruous with the surrounding historic building are damaging to the character of the area. Key reasons for the Clifton area being a desirable part of the city to live are its proximity to green space and characteristic architecture. The proposed height of some of the planned buildings detract from the view of the Downs from some aspects whilst also not blending in with existing architecture. These are genuine concerns that are being hand waved as entitlement. For Clifton to remain a unique part of the city effort needs to be made to retain what makes it unique. Everyone is aware of the need for more housing Bristol. Clifton has already had many of its properties converted to multiple occupancy dwellings. Again, the reluctance to add additional housing is not coming from a place of selfishness. Clifton is already quite densely populated for an area of its size. It also has high numbers of visitors. Parking is already an issue with current residents and visitors. Adding housing inevitably means more cars, exacerbating the issue. Bristol public transport is not affordable or reliable enough for these new residents to rely as their primary mode of transport so building new housing is essentially baking in the need for parking for these new residents. That is potentially 60+ more cars in an area that struggles with parking and traffic. It is easy to claim that residents are being entitled but only residents have a true appreciation for how the plans might impact their local area.</p>	15-Jun-22
4. O	<p>'Other plans include the creation of approximately 200 high-quality, much-needed new homes, located mainly in areas where there are already built structures. Homes will range in size to encourage different generations to live there, and 20 percent will be affordable.' The zoo are hiding behind the need for homes as an excuse for gaining planning permission. 80% of the homes will be highly priced because this is Clifton. It is increasingly likely that these will be second homes for those working in Bristol and living in surrounding beauty spots at weekends. What does 'Affordable' mean?. All of the properties should be for families who will make use of the gardens and play park. Families who cant afford any car let alone 2 cars to make use of cycle facilities etc.</p>	15-Jun-22

5. O	Object. You are not helping people from lower income families. The zoo was central. Every one could get there. It was always full!!! Not all people have cars! Also it's environment in making people travel further by car. Some families were able to walk to the zoo. For people who have live in flats or small houses with very little garden or no gardens would use the zoo as a safe okay plus educational space!! For elderly people it was a safe space to walk and even if alone you could be busy seeing the wonderful conservation with the animals and beautiful gardens. We have enough property for wealthy people. Sadly our own children who are Bristolian can not afford to buy or rent properties. !!!! If all the properties were done on a lottery for all young people and families who need property that may feel more ecological and society fairness. But it's as usual greedy property developers who will pay back hands in our corrupt society and not care about the society or it's long term needs ... Just there own selfishness for money	17-Jun-22
6. O	Having such tall buildings in that beautiful area would be an eye sore. It's not in keeping with the surrounding buildings. It would not blend in.	29-Jun-22
7. O	The development height is out of proportion to the surrounding buildings. The public access gardens are not visible from the public domain. Because of the height and almost full circumference around the garden of the proposed blocks of flats, I am concerned about the amount of sunlight that will reach the public space will be limited. The style of proposed building is out of character for the area. Square blocks of 6-floor flats do not fit within a Victorian and Georgian area. Of course I realise Bristol needs houses - could they perhaps be less ugly?	29-Jun-22
8. O	Whilst i appreciate that the site needs to be developed, i am extremely concerned over the proposed height of the development running alongside Northcote Road. It will mean that my flat will loo directly at a newly developed dwelling and this will not only impede on my privacy, it will also impact on the overall value of the property. The proposal for over 200 dwellings is likely to cause an increase in traffic to the area and, this is already quite saturated. I have concerns that the small, local road infrastructure will not be able to cope with such an increase. I would like the Council to consider reducing the height of the proposed dwellings that overlook Northcote road and also moving them further away from the edge of the proposed development. This will enable a greater level of privacy for all concerned and also a better proliferation of natural light for the residents of Northcote Road, some who live in basement dwellings and where natural light is scarce. Thank you	04-Jul-22
9. O	Any comments on this application are tied to the position regarding the full planning application. However, the substantial harm to the setting of the listed buildings would not be outweighed by substantial public benefit. The context of the listed buildings would be completely eroded and their original purpose would no longer make sense within the proposed development. The proposal does not accord with relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported.	05-Jul-22

10. O	<p>I object to the proposed scheme as it does not respect Clifton, its architecture, Bristol Zoo or its heritage in any way. Nor does it respect the scale of the surrounding buildings or the fact the site is situated in a conservation area. The proposed building designs could have been selected from a house builders' catalogue and built anywhere in the UK. The monolithic brick facades that run along the lengths of Clifton Down and Northcote Road stand out like a sore thumb, to put it mildly. The tallest buildings currently on Northcote Road are approximately 8 meters high which occupies approximately 40% of the road. All remaining buildings are one storey. It is unacceptable to propose buildings at least 14 meters high (4 and 5 storeys high) along the entire length of the road. It's clear there has been little to no consideration for the residents who live on or overlook Northcote Road in terms of loss of light and privacy. The proposed buildings should not exceed the height of the existing tallest building - as is the case for proposed dwellings along College Road. I appreciate the aims of the redevelopment with regards to preserving the gardens along with public access, but this reduces the space available for smaller dwellings to be constructed. The compromise at present is to build tall structures around the perimeter. However, the compromise should be that lower structures are proposed or the balance of dwellings available within the site is reconsidered. I cannot support this scheme.</p>	05-Jul-22
11. O	<p>The proposed development looks like an extreme modern urban overdevelopment and not at all in keeping with its historical Victorian setting. I object on the following grounds: 1. The proposed homes are too high. The new build should no greater in height than the immediate surrounding buildings on neighbouring roads. 2.The proposed design of the buildings are not sympathetic to the area. 3. If this development is really to be sustainable then there should be no allowance for car parking and there should be a covenant on the buildings that residents/occupiers/renters (short and long term) cannot be car owners as well. The future of cities has to be carless and electric cars are not a solution to their petrol or diesel counterparts/forebears. It would be possible to have cars for co-ownership in the surrounding streets which existing residents of these streets could also use and this would help to reduce rates of car ownership generally. There is of course good public transport in Bristol.</p>	11-Jul-22

12. O	<p>I wish to object to the proposal as it stands to build around 200 dwellings on the current Bristol zoo site. I am doing so for the following reasons: My wife and I are former teachers at Clifton College Preparatory School and looking at the plans, I think they will have a considerable impact on the school itself, and we have particular concerns re the impact on the privacy of the students. I feel too the bulidings as currently shown will have a negative impact on the appearance and character of what is an outstanding conservation area. I have a number of former colleagues who live in Northcote Road. The tall structures shown on the plans will have a huge and detrimental impact on the adjoining buildings on Northcote Road. The increase of traffic and the need for parking space as a result of 200 dwellings will be difficult to accommodate and will make life much more difficult for existing residents.</p>	18-Jul-22
13. R	<p>Thank you for consulting HB&amp;P on this application. I apologise for the delay in responding. While the departure of the Zoo from this site will harm the overall historic and communal value of the Gardens, HB&amp;P acknowledges that an element of residential development is acceptable to secure the future of the site. However, we do have concerns with some aspects of the application. We welcome the proposals to retain the 'parkland' setting around the central lake as well as the removal of later unsympathetic accretions to the designated and local heritage assets, and their refurbishment as parkland follies and dwellings. We agree that the location of the new apartment buildings is best located to the perimeter of the site, as proposed, however, their height and scale is excessive and harmful to the setting of the listed Zoo buildings and to the character of the conservation area. The existing buildings to be demolished are small scale and of different heights with spaces between each building, whereas the proposed buildings present a solid built form extending along each frontage, with little permeability beyond the formal entrances. The design and massing of these new buildings, particularly those on Guthrie Street opposite the listed Clifton College buildings, don't appear to fit well within the streetscapes of the conservation area, and at up to 6 stories, are too tall for the area. While not a listed building, the Art Deco clock building contributes to the story and development of the zoo over time. The roof extension is clumsy and doesn't respect the elongated proportions of the building, harming its appearance. Retaining it in its existing form would be preferable, and would provide a needed gap between the taller new buildings to either side. While we don't oppose a modern architectural design, the design of the perimeter buildings should be reconsidered to better reflect the modulation, scale and rhythm of the neighbouring development to ensure the new development will contribute to and enhance the historic interest and significance of the conservation area. Relevant NPPF (2021) policy considerations are:</p> <ul style="list-style-type: none"> <li>o Paragraph 195: "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal".</li> <li>o Paragraph 199: "When considering the impact of a proposed development on the significance of</li> </ul>	27-Jul-22



	<p>a designated heritage asset, great weight should be given to the asset's conservation". o Paragraph 200: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification." Chapter 16 of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990 establish the requirements to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. I would be grateful if we could be informed of the outcome when this becomes available. Regards Ross Anthony</p>	
14. O	<p>The blocks proposed are overmassed and overscaled. They are incongruous in the setting of surrounding listed buildings, buildings of historic significance and the Downs. The infrastructure required to serve the new buildings is likely to cause serious damage to the roots of rare trees, shrubs and other plants. The applicants appear to have failed to give serious consideration to this problem. As there are insufficient parking spaces for the number of cars owned by site residents, it is likely that the roads within the development will be littered with parked cars. It seems unlikely that future residents of these dwellings will be prepared to fund the substantial cost of properly maintaining the Gardens. Rare species often need specialised care. This aspect of the proposals needs to be given careful consideration. How much does the Zoo spend on garden maintenance at present? This development will not enhance or improve the Conservation Area. The founding fathers would certainly not approve of the site being turned into a housing estate.</p>	09-Aug-22

15. O	I write to object to the revised plans, in particular to the plans for North block (N1, 2 & 3) of boundary buildings. Despite the tinkering of P& P's reply to previous criticism, the height of the block of 6 storey housing is still both domineering and inappropriate. 6 storeys is much too tall, dwarfing the charming and iconic Main Entrance building and creating a barrier with The Downs. Moreover, the design of the these buildings, and other boundary blocks, is not site specific. The designs are NOT a 'sensitive response to historic context', as P&P claim. These are generic buildings which could drop into any urban area anywhere. Decorating ends of the North buildings with zoo animals is merely window dressing, not addressing this issue. The present design is so mediocre that it risks, in 30 years time, looking like the buildings round Bristol's Bear Pit. As the Victorian Society has explained so carefully, this zoo site is very rare. It is much loved and, if it must be developed, deserves the highest quality treatment, not shown in this present planning application.	14-Aug-22
16. O	I write to object to the perimeter buildings on this site proposal. I support the criticisms of both the Victorian Society and Historic Buildings and Places with reference to the density and height of the perimeter housing. These proposals do not take account either of the effect of the housing on the internal space of this rare early 19th century zoological gardens, nor of the effect on the external, Conservation Area, neighbouring houses. Their charitable purposes clearly state that their responsibility is to achieve best value, not best price. Neither density, nor height of the housing is necessary. This is a unacceptable legacy from this much-loved institution to leave to the Clifton area and wider Bristol.	14-Aug-22
17. S	I would like to record my support for the zoo's development plans to counter the negativity of entitled neighbours, horrified at the idea of much-needed housing being built in this part of Clifton. The designs are sensitive, with buildings only proposed where buildings already exist; traffic will be far less than current zoo visitors - and the public will be given free access into the beautiful gardens. While it is incredibly sad that the zoo has to close, this application needs to be approved so that the people of Bristol can benefit from the additional housing - and the zoo can realise the sale and obtain funding to continue its valuable work.	23-Aug-22

18. O	<p>As a local resident I am concerned about the effect of the residential development of the Zoo Site. Clifton as a whole is already running low on space for existing households. In particular the issue of parking for cars. 201 extra household will invariably mean a significant increase in the number of cars. Either 201 parking spaces (an undesirable idea) will need to be provided or residents will end up parking their cars in surrounding streets which are already very full. The aesthetic of the area also must be considered. There are several examples of unsympathetic development throughout the Conservation Area already. It is of course impractical to demolish them. The Zoo site should not become another of these unsympathetic developments. The aesthetic of the area is integral to what makes Clifton a unique part of Bristol. The style of many of the proposed buildings do not fit the style of other residential properties in the area. I am also concerned that some of the buildings are too tall. Many of the buildings in the surrounding area are harmonious in height. The number of stories ought to be reconsidered to fit in better with the surrounding buildings. In summary I feel that the redevelopment of the Zoo site ought to be a purely community focused project. The residential plans ought to be scaled back significantly, if not entirely removed. The redevelopment of such a historically important site should not be seen as a financial opportunity but a preservation project. Preserve the integrity of the local area and the history of the site.</p>	03-Sep-22
-------	--	-----------

19. O	<p>I would like to make it clear that the majority of the opposition to the current development plans have nothing to do with neighbours being 'entitled'. The Zoo site is in a Conservation area, that does not mean new housing cannot be built, it means that developers need to have sensitivity when designing the housing. Building styles that are incongruous with the surrounding historic building are damaging to the character of the area. Key reasons for the Clifton area being a desirable part of the city to live are its proximity to green space and characteristic architecture. The proposed height of some of the planned buildings detract from the view of the Downs from some aspects whilst also not blending in with existing architecture. These are genuine concerns that are being hand waved as entitlement. For Clifton to remain a unique part of the city effort needs to be made to retain what makes it unique. Everyone is aware of the need for more housing Bristol. Clifton has already had many of its properties converted to multiple occupancy dwellings. Again, the reluctance to add additional housing is not coming from a place of selfishness. Clifton is already quite densely populated for an area of its size. It also has high numbers of visitors. Parking is already an issue with current residents and visitors. Adding housing inevitably means more cars, exacerbating the issue. Bristol public transport is not affordable or reliable enough for these new residents to rely as their primary mode of transport so building new housing is essentially baking in the need for parking for these new residents. That is potentially 60+ more cars in an area that struggles with parking and traffic. It is easy to claim that residents are being entitled but only residents have a true appreciation for how the plans might impact their local area.</p>	03-Sep-22
-------	--	-----------

## Second consultation phase

7<sup>th</sup> November 2022 – 15<sup>th</sup> January 2023

STANCE	COMMENTS	DATE RECEIVED
20. O	I have re-read the revised documentation that has been submitted, but have been unable to identify any changes that in any way address the points that I raised in our initial objection. It would appear that the concerns over the style and density of the development and the severe overbearing nature of the proposed construction in a low rise neighbourhood have not been in any way listened to. I would like the committee to consider our previous concerns to be very much still current, and request that they reject this development for something in keeping with the character, heritage and style of the surrounding streets.	13-Nov-22
21. O	After reading through the planning permissions I am shocked at how we have been misled. I was under the impression that the focus was going to be placed on creating a local garden that would represent the zoo's history. Instead there is going to be a large housing development that destroys so much of the incredible wildlife that the zoo has. I think another tourist attraction would be a much better use of space and would drive the tourism industry in Bristol. We could have a Bristol kew gardens. I have many memories as a child playing in the zoo gardens and now as a young adult was looking forward to doing the same with my children. Please stop this housing development, it's going to do a large amount of damage for many many years, when there is an easier much more pleasant solution.	29-Nov-22

22. O	<p>Summary of Objection The role of zoos within the UK and throughout the world has obviously changed over time from what could be considered as traditional visitor attractions, to one where zoos are now centres of learning and excellence whose function is to ensure the survival of critically endangered species. From reviewing the latest available published figures, around 500,000 people visited Bristol Zoo in 2019. Since it opened in 1836, over 90million people have passed through its gates. Families have been entertained and interacted with the animals at close quarters. They have learned about the vital conservation work that is integral to saving endangered species across the planet. However, we are of the firm belief that the closure of this much loved and respected Zoo is premature and ill judged. We believe that the proposals to convert the site into a housing scheme has been poorly conceived and designed and fails to recognise the architectural importance of the wider area. Planning Policy The site of Bristol Zoo sits within the Conservation Area of Clifton &amp; Hotwells. Clifton &amp; Hotwells was designated as a conservation area on 26 September 1972 and extended on 16 February 1977 and 18 February 1981. The Clifton &amp; Hotwells Conservation Area Character Appraisal was adopted on 14 July 2010. In exercising its planning functions in a conservation area, the local planning authority is under a duty to pay "special attention to the desirability of preserving or enhancing the character or appearance" of the area (s.72 Planning (Listed Buildings and Conservation Areas) Act 1990). Bristol's conservation areas are the subject of policies in the Bristol Local Plan as described below. The Local Plan now consists of the Core Strategy which was adopted in June 2011 and the Local Development Policies plan, which was adopted in 2014. These documents alongside the Conservation Character Appraisal form the Development Plan and all planning decisions put before the Authority should be based around these local plan policies and National Planning policy and guidance. National Planning Policy is in the form of the NPPF 2021 which provides strategic and high level guidance to Developers and Local Authorities in relation to development proposals. Specific guidance in relation to housing development and the potential impact on heritage assets is detailed within Chapter 16 Conserving and Preserving the Historic Environment. This chapter goes into more detail as to what is expected of an Applicant when submitting developments proposals and how Local Planning Authorities should measure and assess such proposal in the context of the importance of such heritage assets, eg Listed Buildings and Conservation Areas. Local Context The conservation area of Clifton &amp; Hotwells focuses upon the development of terraces, crescents and streets that rise from Hotwells in the south before meeting the open landscape provided by Avon Gorge and Clifton Down to the west and north. The area is characterised by its dramatic climb from 10m above sea level at the lowest point alongside the Floating Harbour, reaching up to 90m at the highest towards Clifton Park where Bristol Zoo is located. Bristol Zoo is surrounded by buildings that are owned and operated by Clifton College (Guthrie Road and Northcote Road) and early, mid and late Victorian, 3 storey villas that are situated along College Road and the wider urban environment beyond. The predominant built form of the immediate area surrounding Bristol Zoo area large Victorian 3 storey (plus basement) villas which are either</p>	04-Jan-23
-------	--	-----------

detached or semi-detached being either two or three bays wide. These properties are set back from the pavement edge with front mature front gardens and low boundary walls. There is a very strong and prominent building line that is consistent across the area. The dominant building materials used within these building is rubble limestone, pennant sandstone and Bathstone quoins and detailing. Windows are traditional timber sash with panelled front doors. The overall architectural style provides a strong sense of place that manages to combine residential elements along College Road with a strong and robust architectural style of Clifton College seen along Guthrie Road and Northcote Road. Figure 1 below provides an overview of the building type, context and character of the wider Bristol Zoo area. Of note and of relevance to this application is;

- Blue highlighted buildings to the south of Guthrie Road - Listed Grade II
- Brown highlighted buildings located along College Road and Northcote Road. These are buildings which add value to the townscape character and make a positive contribution to the conservation area.
- Mauve highlighted buildings. Key unlisted buildings such as Clifton Pavilion and buildings belonging to the Clifton College along Guthrie Road and the wider educational establishment that contribute to the character of the area.

Figure 1 Extract of Buildings Types surrounding Bristol Zoo. Taken from Clifton & Hotwells Conservation Character Area Appraisal 2010. Of greater importance is the wider views (medium and long distance) that are found within this part of the Conservation Area. Clifton Downs is located directly to the north of the Bristol Zoo site. It rises up steeply to provide panoramic views over the Zoo, Clifton and beyond. The significance of these views cannot be overstated and Bristol Zoo as well as Clifton College adjacent are identified as a 'Landmark of City wide importance' within the Character Appraisal. Figure 3 below, provides an extract of the important views that have been considered prominent within and adjacent to the Bristol Zoo site. As can be seen many of these views look north towards Clifton Downs (L23 - L27) but equally views are equally possible looking south from Clifton Downs across Bristol Zoo, Clifton and the wider urban environment (See green crescent shape in extract below). The applicant proposes to construct a six storey high apartment block (spanning the entire width of the site), along the northern elevation, that will rise above the existing ground level by some 19.35m. By doing so it will completely obliterate existing views looking south from the Downs across Clifton and the wider environs of Bristol. See photo image (figure 2) below. Figure 2 View looking south from Clifton Down onto northern boundary of Bristol Zoo. Red Line approximately defines height of proposed apartment block The overall setting and character of Bristol Zoo is one that has evolved and developed over nearly 180 years. There are buildings within the Zoo site and along the periphery of the site that do not compliment the historic character of the area but they in most instances do not impose or detract historic integrity of overall historic importance of this area. Figure 3. Extract of Important views as described in the Clifton & Hotwells. Conservation Character Appraisal. 2010. As can be seen from Figure 4 below, a clear sense of place and architectural style has been created over the development of this part of the Conservation area. This has allowed the Bristol Zoo site and the Clifton College site to form a 'hub' of

larger institutional buildings that is surrounding by smaller scale but none the less, important Victorian residential buildings. These Victorian villas broadly define the east and western boundaries of the Bristol Zoo (and Clifton College) site along College Road and Pembroke Road. The open space of Clifton Downs then provides a natural 'full stop' to any development directly to the north which is bordered by Clifton Down Road. The Conservation Character appraisal states at para 6.1.4 that; The street pattern to the north of the conservation area is more regular, and sits more comfortably on a grid pattern of cross cutting streets, with the Zoo and Clifton College at their heart. The Applicant is attempting to redefine the very character of the conservation area by introducing inappropriate and poorly designed residential apartment blocks that will be entirely alien to the setting of the conservation area and its setting. Such buildings will be at odds with the overall architectural layout and theme of this area that has taken almost 180 years to evolve. These monolithic apartment blocks will impose an architectural style on this area that will be completely alien to this character and setting of this area and will fail to preserve or enhance the conservation area. Figure 4 Extract of Land use within the Clifton & Hotwells Conservation Area. 2010. Appraisal and review of the proposed design i). Comparative heights of buildings. There has been no critical analysis and discussion of the different roof heights of the proposed apartment block compared to the buildings immediately adjacent to the site along College Road, Guthrie Road and Northcote Road. There are no cross-sectional drawings to show how the proposed apartment buildings will relate to the existing buildings in height, scale and mass. If such drawings did exist, it would clearly show the disparity between the height of the proposed apartment blocks compared to the educational buildings of Clifton College and the Victorian residential villas along College Road. The apartment blocks (known as E1, E2 E3 and S1) will completely dominate the educational buildings of Clifton College, located along Northcote Road and Guthrie Road. From reviewing the proposed elevational drawings provided by the applicant, the buildings will rise up on average between 14,0m to 17,0m above ground level. It is accepted that there are ground level differences running north to south, but the overall impact of such inappropriately designed buildings being located directly opposite these handsome educational buildings will lead to a downgrading of the architectural value of these buildings and will have a detrimental impact within the conservation area. Equally and potentially of more importance is the impact on the northern block (N1 2 & 3) on the listed building in the North West corner of the site. (detailed as the Clifton Conservation Hub). This unique building which is listed Grade II will be completely dominated by the construction of this new apartment block. No attempt has been made by the Applicant to review or explain this impact or show the inter-relationship between the existing heritage asset and the proposed apartment block. ii) Loss of open green space within the site Whilst it is fully acknowledged that access into Bristol Zoo is via an entry fee, the Zoo has been designated as a Local Historic Park & Garden and an Important Open Space. The area provides a traffic free space that allows visitors to interact with the animals at very close quarters. The proposals would completely and totally alter the character



	<p>of this area by introducing tarmaced roads, parking spaces (for 121No vehicles) and garage parking throughout the site. The sense of place would be altered from a traffic environment to a fairly standard suburban housing estate. It will resemble a gated community that will restrict access to the general public and will eventually provide communal garden areas for the sole use and enjoyment of the residents. Inevitably the lack of parking spaces provided within the scheme, will mean that increasingly cars will be parked inappropriately along the internal access roads further detracting from what is currently a pleasant green open space. There is increasing concern that despite the assertion from the Applicant that the internal green areas will be open to the public, the layout and form of the proposed scheme will completely alienate the general public from visiting this site. The newly formed entrances into the site will provide direct road access into the site from College Road, Clifton Down and Guthrie Road. The invitation for the general public to explore the internal green space will not be clear and it will be increasingly seen as the preserve of the use of the residents only. This is very much at odds with the zoo's historic role as a key part of the city's green / open space fabric, reflected by its planning designation as a Local Historic Park &amp; Garden and an Important Open Space. iii). Loss of historic boundary features The proposals for the development of the various apartment blocks along Guthrie Road and Northcote Road means that entire lengths of existing rubble and pennant sandstone boundary wall features will need to demolished. These stone walls range between approximately 2.5m high to about 5,0m - 6,0m high at the junction of Guthrie Road and Northcote Road. The loss of such historic features to accommodate these apartment blocks will further degrade the historic fabric of the Zoo site and will have a detrimental impact on the conservation area in this locality. Equally the construction of the apartment block running parallel to Clifton Down (northern boundary) will also mean the entire loss of this boundary wall that currently exists. The drawings do not make it clear at all whether this boundary wall feature is being retained or not. It is assumed currently that the boundary wall will be demolished. There is an equally strong boundary wall feature that exists along College Road. It is not at all clear from the proposals as to whether this 2.5m high wall will remain intact or whether this will be demolished also. Further clarification should be sought from the Applicant as to his intentions. iv) Enabling Development It is accepted that in some instances in order to make a development commercially viable, some alterations need to occur to listed buildings and heritage assets. This is the case for the Giraffe House and other listed buildings within the site such as the Bear Pit, the Monkey Temple and the Aviary building. The Applicant is proposing to convert the Giraffe house into residential accommodation and the remaining heritage assets will be integrated into the wider landscaping scheme for the site. However, what has not be made clear by the Applicant is the justification for such a radical change from one use to another. Paragraphs 199 - 208 of the NPPF (2021) goes into greater detail as to how harm should be assessed and whether the significance of that harm is acceptable or not. The concluding paragraph (208) is of particular significance for this application. It states that; Local planning authorities should assess</p>	
--	--	--

	<p>whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. It is vital that the LPA carefully reviews the justification of harm to these important heritage assets and whether the principal of development here has been fully explained and justified. We are of the firm belief that the significance of harm that the proposals will have on the Conservation area as well as the listed heritage assets do not outweigh the benefits of the proposed scheme.</p> <p>v). Tenure &amp; Ownership The affordable housing statement (Savills, October 2022) seems to suggest that the spread of first homes and affordable rented accommodation (40No units in total) will be evenly spread out across the site and that as a result the scheme will be 'tenure blind'. However, if one analyses the accommodation schedule that has been prepared by the applicant, it is evident that Block S1, all 30No units within this block will be rented and managed by a social housing provider. The 10no first homes will be spread out between Blocks E2 &amp; E3. We don't see how such a proposal will successfully integrate the different types of tenure into the scheme. It will only serve to potentially stigmatise the occupants of this apartment block (S1) and the overall housing scheme will be poorly integrated as a result.</p> <p>vi) Loss of a Community Facility There is a clear and direct link back to the Bristol Core Strategy (2011) and the Development Plan Policies (2014) that seeks to prevent the loss of Community Facilities. The Local Plan does not precisely define what a community facility is, but at para 2.5.2 it states that community facilities can be; community centres and childcare facilities, cultural centres and venues, places of worship, education establishments and training centres, health and social care facilities, sport and recreation facilities and civic and administrative facilities. It may also include other uses whose primary function is commercial but perform a social or community role i.e. sport, recreational and leisure facilities including local pubs. Both Local Plan policy DM5 and Core Strategy Policy BCS12 make direct reference to the fact that the loss of Community Facilities will not be permitted unless it can be clearly demonstrated that there is no longer a demand for the facility or that the building/s are no longer suitable to accommodate the use and the building cannot be retained or adapted to another community use. Furthermore Policy DM5 goes onto state that the loss of a community facility will only be acceptable if a replacement facility can be provided in 'a suitable alternative location'. The location of the Wildplace Project is in a location (off Junction 17, M5) that will require visitors to arrive via car or other motorised transport. The site is totally inaccessible to people without the means of a car. The appeal of the Bristol Zoo site is that it is centrally located and it is accessible via bus or by foot or by bicycle. We would strongly argue that the Applicant has not fully and sufficiently demonstrated that the alternative uses of the Zoo as a community facility has been fully and carefully explored. There has been no critical analysis and explanation as to whether the buildings and the site as a whole can be enhanced, adapted or whether a mixed use scheme could be introduced in order to keep the Zoo site operating as a commercial concern in its current location. The Zoo has played a crucial and integral role in the local community for the past 180 years.</p>	
--	---	--

	<p>The Applicant appears to be ignoring the very strong relationships that have developed over this period between the local community and the zoo and is basing decisions about the future of this facility purely of commercial and financial objectives. Scant regard has been paid as to the potential impact that the closure of this facility will have on the local community and its potential replacement in a total unsustainable location that can only be accessed if families or individuals have a car.</p> <p>Conclusions The City of Bristol Local Planning Authority have a legal duty which is clearly set out in the Listed Buildings &amp; Conservation Act. The LPA must have special regard to protecting listed buildings and the character and appearance of conservation areas. They must ensure that the setting and context of these important heritage assets are duly protected, preserved and enhanced. The NPPF (2021) places considerable weight on ensuring that these importance heritage assets are duly protected and requires Decision Makers to pay due regard to ensuring that such assets are not negatively impacted by development proposals. LPAs are clearly advised that they should refuse planning permission if the impacts of a development outweighs the benefits of such a proposal. (ie the delivery of housing units). Overall the proposal that has been submitted by the Applicant for consideration does not preserve or enhance either the character or appearance of Clifton &amp; Hotwells conservation area. The impacts on the various listed heritage assets (within and adjacent to the site) have not been fully justified and explained. The benefits of the proposal do not outweigh the impacts on these important buildings as defined above. The loss of green open space within the site is of great concern and the proposals put forward provide no evidence that this space would be guaranteed for public use in perpetuity. We would recommend that your officers recommend refusal of this application and urge you to support our objection of this application. Both Local plan and National planning policy provide a clear route to substantiating a refusal of planning permission. Notwithstanding the above we have outlined below a number of reasons for refusal which we believe are relevant and pertinent to this application.</p> <p>Reasons for Refusal The proposed development due to its insensitive design, form, scale, positioning and due to the loss of original fabric, would fail to respect the existing special character and historic significance of the listed building. It would also harm the character and appearance of Clifton &amp; Hotwells conservation area. The harm is not outweighed by adequate public benefit and therefore the proposal is contrary to the NPPF, adopted Policies BCS21, BCS22, DM26, DM30 and DM31, Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant guidance from SPD2 - A guide for designing house extensions and alterations. The proposed development at roof level would impose visual disharmony and the impact on the adjacent educational and residential buildings. The change in building height would be particularly noticeable when viewed from Clifton Downs and would undermine the appearance of the Conservation Area thus failing to accord with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposed works would amount to substantial harm, it is considered that there are insufficient public benefits associated with the development and would therefore fail to</p>	
--	---	--

	<p>accord with the requirements of Paragraph 202 of the NPPF and Policies BCS22 - Conservation and the Historic Environment of the Bristol City Council Core Strategy (adopted June 2011) and DM31 - Heritage Assets of the Bristol City Council Site Allocations and Development Management Policies Document (Adopted July 2014) and is therefore unacceptable. By virtue of its siting, scale, form, mass and overall design the proposed development as currently designed would therefore appear as an unsympathetic and overly prominent addition in this setting, failing to preserve the character of the established street scene; this part of the Clifton &amp; Hotwells Conservation Area or the setting of surrounding Listed Buildings. Accordingly, the proposal conflicts with Section 16 of the National Planning Policy Framework (2018); Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990; Core Strategy (2011) Policies BCS21 and BCS22 and Site Allocations and Development Management Policies (2014) DM26, DM29 and DM31. The Applicant has failed to suitably demonstrate that the loss of this important community facility is justified. The evidence put forward does not provide sufficient justification as to why this community facility has to close and why an alternative or more suitable appropriate use cannot be found in this location that would allow the site to be utilised and be maintained as a community facility for the longer term. Core Strategy (adopted June 2011) Policy BCS12 and Site Allocations Development Management Policies DM5. (Adopted July 2014) and is therefore unacceptable.</p>	
--	---	--

## Third consultation phase

16<sup>th</sup> January 2023 – 17<sup>th</sup> April 2023

STANCE	COMMENTS	DATE RECEIVED
23. O	I write to object to the revised plans, in particular to the plans for North block (N1, 2 & 3) of boundary buildings. Despite the tinkering of P& P's reply to previous criticism, the height of the block of 6 storey housing is still both domineering and inappropriate. 6 storeys is much too tall, dwarfing the charming and iconic Main Entrance building and creating a barrier with The Downs. Moreover, the design of the these buildings, and other boundary blocks, is not site specific. The designs are NOT a 'sensitive response to historic context', as P&P claim. These are generic buildings which could drop into any urban area anywhere. Decorating ends of the North buildings with zoo animals is merely window dressing, not addressing this issue. The present design is so mediocre that it risks, in 30 years time, looking like the buildings round Bristol's Bear Pit. As the Victorian Society has explained so carefully, this zoo site is very rare. It is much loved and, if it must be developed, deserves the highest quality treatment, not shown in this present planning application.	24-Jan-23
24. O	I write to object to the perimeter buildings on this site proposal. I support the criticisms of both the Victorian Society and Historic Buildings and Places with reference to the density and height of the perimeter housing. These proposals do not take account either of the effect of the housing on the internal space of this rare early 19th century zoological gardens, nor of the effect on the external, Conservation Area, neighbouring houses. Their charitable purposes clearly state that their responsibility is to achieve best value, not best price. Neither density, nor height of the housing is necessary. This is a unacceptable legacy from this much-loved institution to leave to the Clifton area and wider Bristol.	24-Jan-23
25. O	Object because it's the loss of a public amenity and loss of green space and loss of a beautiful historic garden with many irreplaceable trees.	03-Feb-23
26. O	We object to this redevelopment on the grounds that this redevelopment will not preserve or enhance the character of the area especially in a conservation area. The Zoo's legacy should be sympathetic to this and therefore, special attention should be made to this objection by the council. Many thanks.	08-Feb-23

27. O	<p>I object to this application 22/02889/LA and the associated application 22/02737/F. These two applications are a scheme for redevelopment of Bristol Zoo Gardens from a site of public, natural and cultural heritage to private, residential housing and they should be considered together. I have read the report provided by Save Bristol Zoo Gardens (Report) as well as applicant's main planning documents. This is not a comprehensive list of reasons but several which are important to me. 1. The Zoo provided misleading reasons for its closure. According to the planning statement, the Zoo suffered a decline in visitor numbers from 1m to about 500,000 a year which caused the Zoo to make a loss. The reason for this loss is blamed on the small site, inability to meet the animals' needs, and inadequate parking. The Report shows that the Zoo's attendance numbers are better than comparable zoos, not that far off London Zoo, and that the Zoo has made profits in recent years including with Government support during Covid. The Report states that the majority of the Zoo's animals will be sold or given away. The public is being led to think that the majority of the animals will be kept and given larger enclosures at the new site, when this is not the case. It may be a better match for the Zoo's conservation aims but ultimately feels like they are deliberately fudging things. Like many friends and family, who have grown up with the Zoo, we were initially behind the Zoo's closure as we believed the reasons given. But it looks like we were not properly informed. 2. The Zoo is a very special site for Bristol. Housebuilding should not be something to be pursued at the expense of destroying the special character of our City. Decent housing should be a right for all. Many Bristolians are unhoused, or live in housing which makes them cold and sick. Yet Bristol Post reported in 2021 that there are over 1,000 empty homes in the city. Why should the Zoo be developed into houses? The site has been a well-loved public place for 180 years. The fact that it charges an entry fee is not relevant. Anyone who has ever been there will remember visitors of all description: class, race, gender, age, locals using the playground, tourists gawping, a couple on a date, a family's special day out, schoolchildren, even visiting scientists. If housing trumps everything (which is what the current Mayor has said), then we should be building on the Downs, or tearing down the Suspension Bridge in favour of a newer, wider bridge. We don't do that because these places are special and part of the character of our City. The Zoo is part of Bristol's cultural heritage. Developing the Zoo into housing is no way "respecting the character and heritage of the site". It will mean Bristol and its citizens lose one of the defining features of our City. The Zoo and 196 households will be richer, but the rest of us will be poorer for it. 3. The Zoo shouldn't be allowed to act like a private developer in relation to what has become over 186 years, a public asset. Query whether the Zoo, as a charity, has powers to make this application if it is against the broader public interest. Bristol Zoological Society is a charity dedicated to conservation and education. It runs Bristol Zoo as well as the Wild Place Zoo in South Gloucestershire. As a charity it has tax exemptions because of the public benefits of its objectives. But what if this application can be seen as a conflict between the objectives of conservation and public benefit? This means while it may be lawful under its constitution to take the best action for conservation and education, this comes at the expense of the value and importance of the Zoo site to the City and its people. Does the Zoo not have a duty of care to the public? In "A Pattern Language" (1977) by Christopher</p>	18-Feb-23
-------	---	-----------

	<p>Alexander and others, it states "When you build a thing you cannot merely build that thing in isolation, but must repair the world around it, and within it, so that the larger world at that one place becomes more coherent, and more whole." In 2023, more and more people accept that keeping wild animals captive makes them suffer. What if a zoo for the future doesn't do that anymore, while maintaining the public interest for some kind of zoo at this site. Could development at this site be used to repair the damage caused by zoos of the past and create a positive way forward, encouraging greater empathy with animals and natural habitats both familiar and alien to us, to benefit the Zoo's animals and the wider public of Bristol? If the Zoo doesn't want to pursue this, could they be encouraged to sell to a publicly minded entity that will? In summary, this site has special significance to Bristol and its people and it should not be turned into housing of any kind.</p>	
28. O	<p>As a member of Bristol Zoo and BOTANICAL GARDENS, I was not informed of imminent closure. Bristol residents given no opportunity to fund raise There is no reason (other than financial), to destroy 12 acres of World Famous Botanical Gardens ancient trees, for high end housing in an environmental crisis. Ancient trees, plants gone for ever. The site has to be preserved for future generations.</p>	23-Feb-23

29. O	<p>The application proposals breach the Planning (Listed Buildings and Conservation Areas) Act 1990 (the "LB and Conservation Areas Act") in failing to preserve or enhance the character or appearance of the area (Article 72(1)). Clifton Conservation Area was designated in 1970 and the Conservation Area Appraisal was updated in 2010. The Clifton Conservation Area Appraisal lists Bristol Zoo among six "crucial landmarks nationally and on Bristol's landscape" (para 6.3.2). "The variety and quality of views in Clifton are a critical component of the area's special interest," (para 6.2.3) The proposals conflict with Long View L25, Local View LC21 and a Landmark of City Wide Importance (see Map 4). The cumulative effect of high density housing development on West Car Park and Bristol Zoo will result in a canyon effect. This will result in substantial harm to neighbouring listed buildings, heritage and the Clifton Conservation Area, in conflict with the Appraisal and the LB and Conservations Area Act. Core Strategy Policy BCS22 requires that "Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including ... Conservation Area." The proposals conflict with Policy BCS22 with regard to scale, design and massing. I do not accept the position of Historic England. These proposals will result in substantial harm to the Conservation Area and the important listed buildings on Guthrie Road at Clifton College. This application for Listed Buildings Consent should be refused.</p>	24-Feb-23
30. O	<p>This space, without animals, should be for all the people of Bristol to enjoy. The proposed plans do not reflect this ethos. Luxury housing is not an appropriate plan for this space. Moreover, the cutting down of so so many trees would be so damaging. Support heritage and history for all of Bristol to enjoy. Rather than financial wealth for a few. There are so few chances to save local hertigate sites, save this space for the future generations.</p>	02-Mar-23



31. O	<p>It is well known, but little regarded, that there are many disadvantages in preparing design proposals from the metropolis for the genius loci of an historic city in the provinces and this scheme illustrates it very well. . But there is one potential advantage for a metropolitan elite, concerning the provision of private outdoor space, and an exploration of that feature alone will serve to demonstrate how ill-fitting are the proposals for the Bristol Zoo site. London has demonstrated time and again the inability of their architects to design effective, private outdoor spaces for flats, since the first C20 mansion blocks grew balconies. Reduced of late to becoming transparent, wind and rain stricken and offensive of townscape with residents' clutter, such balconies are mostly entirely unsuited to the British climate. Flat-owners have been progressively failed by architects, in even medium-rise blocks. Unfortunately the London architects for the zoo site still fail to grasp these issues. When the designs are coupled with flat roofs and hideously level parapets, one has to start asking questions such as why are the ground- and first-floor flats not given open space on ground level with private stair access, and roof pavilions as climate havens on flat roofs given to second- and third-floor flats, served by private stairs and dumb-waiters? . Such solutions provide ready opportunities to create modelled roof scapes that would respond to listed buildings and the historic streets of Clifton, and the need for a green architecture. Where were such assessments by the client body at concept and by the planners at pre-application stages? . This retired conservation architect accordingly supports the analysis of the project by Downs for People, the objections of the Victorian Society, Bristol CAP, and Avon Gardens Trust. Equally the idea of a virtual zoo is unhelpful.</p>	07-Mar-23
-------	--	-----------

32. O	<p>The current proposals mean irrevocable damage to the historic design, layout and use of the Botanical and Zoological Gardens. Since their design by the local architect Richard Forest in 1836, the gardens were intended for the recreation and education of the citizens of Bristol and beyond for succeeding generations. Although overlaid by subsequent buildings for housing more animals from the 1930s onwards, the original design, including the long walk and borders, lake and pavilions are still evident. The layout of the historic gardens should continue to be used for the purposes for which it was designed. For generations, the people of Bristol, of all ages and backgrounds, have enjoyed the communal value of the gardens, the green space, the opportunities afforded to spend time with families, friends, to celebrate milestones of family history such as weddings and funeral wakes. In particular, the level paths and beauty of the gardens, with or without animals, have provided an intensely valuable resource for children and adults with multiple physical and learning difficulties. The closure of the gardens to some of the most vulnerable people in our society is an unjustifiable loss. The current proposals for development of substantial housing within the site destroys the historic character and use of the site, and will undoubtedly become little more than a gated site for wealthy owners, with very limited or indeed no public access in any meaningful manner. The introduction of garages, parking spaces and roads for cars on the site is unacceptable given the increasing desire of Bristolians to limit car use and would be an unwelcome, unjustifiable intrusion into the site. The design and layout of the proposed dwellings are oversized, too high and do not complement the existing buildings nearby, especially the architecturally significant elements of Clifton College.</p>	07-Apr-23
-------	--	-----------

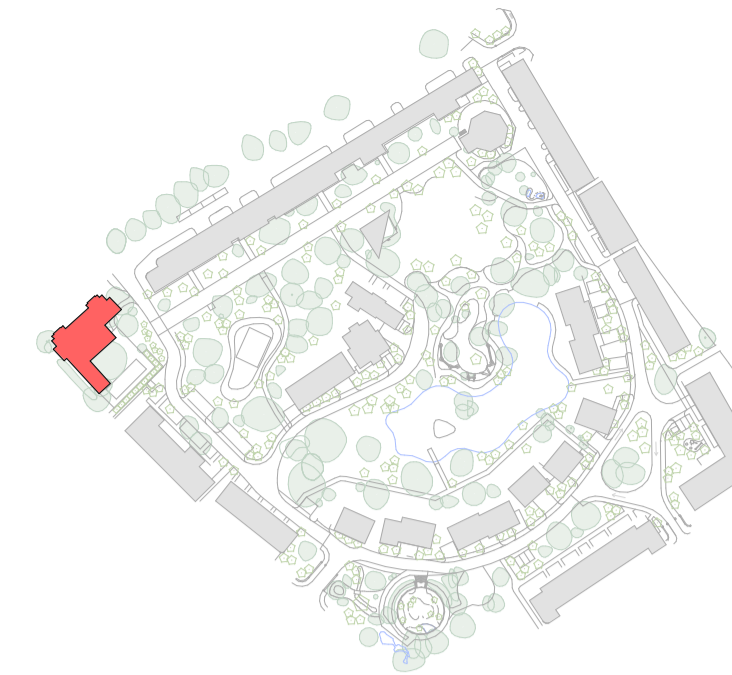
## Supporting Documents

### 1. Bristol Zoo Gardens, Guthrie Road, BS8 3HA.

1. Extent of Listed Building Consent Application
2. Clifton Conservation Hub (Entrance Lodge) - Proposed Elevations
3. Clifton Conservation Hub (Entrance Lodge) - Proposed Floor and Roof Plans
4. Bear Pit - Proposed Elevations & Sections
5. Bear Pit - Proposed Floor Plans
6. Birds of Prey Aviary - Proposed Elevations
7. Giraffe House - Proposed Elevations
8. Giraffe House - Proposed Floor Plans
9. Guthrie Road Entrance Gates – Proposals
10. Monkey Temple - Proposed Drawings



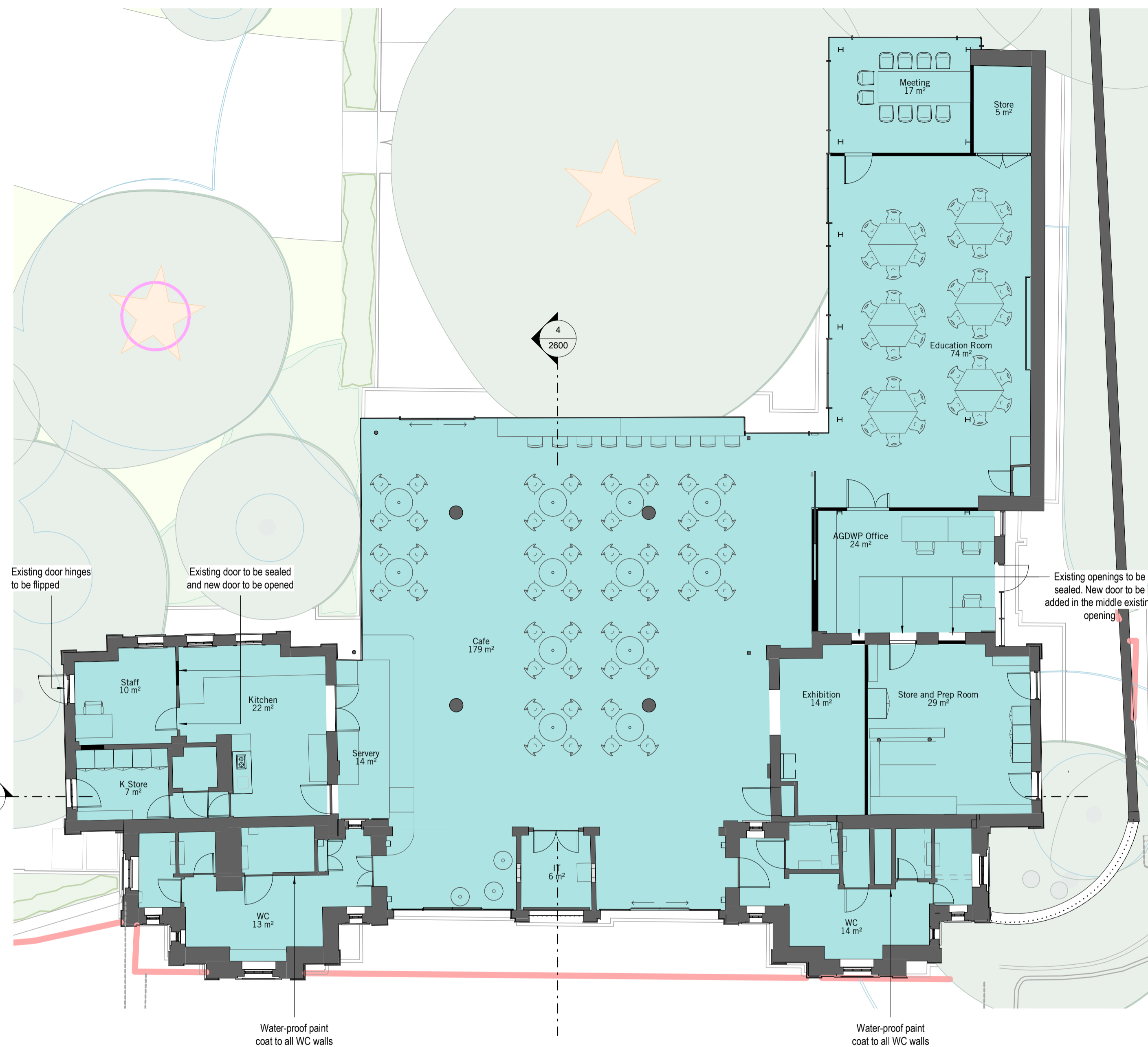




© Penoyre & Prasad  
 Contractors do not scale from this drawing.  
 Dimensions are to be verified on site prior to construction.  
 Ordnance Survey Data reproduced by permission of Ordnance Survey® on behalf of Her Majesty's Stationery Office. © Crown Copyright. All rights reserved.  
 Penoyre & Prasad are a trading division of Perkins & Will UK Ltd

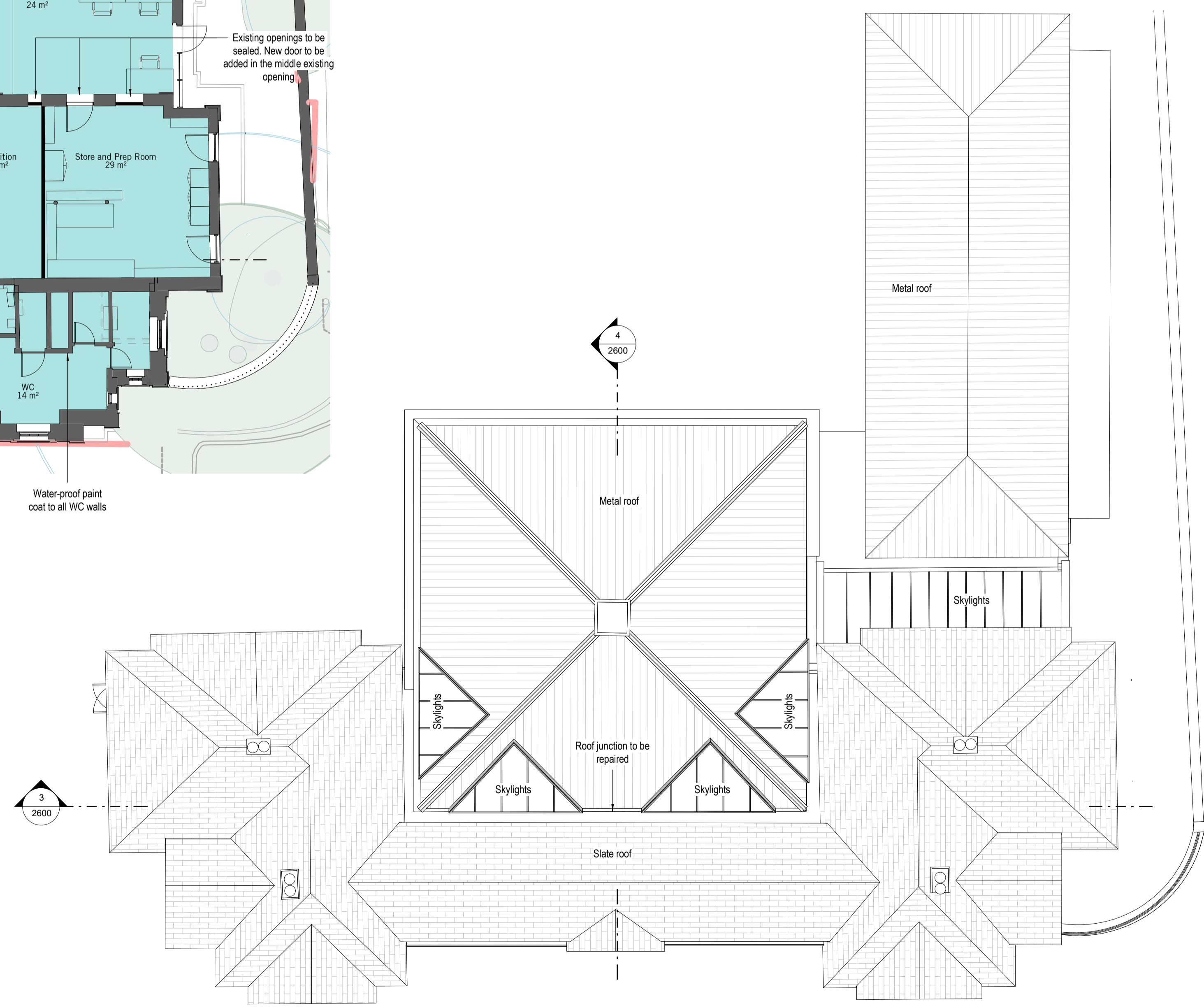
**Drawing Legend**

- Existing Building Retained
- New Proposed



Page 814

**1 Clifton Conservation Hub - Proposed Ground Floor**  
 1 : 100



**2 Clifton Conservation Hub - Proposed Roof**  
 1 : 100

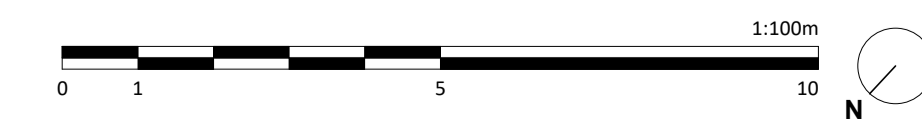
NO.	REV.	DATE	BY	CHK.	DESCRIPTION

**Penoyre & Prasad**

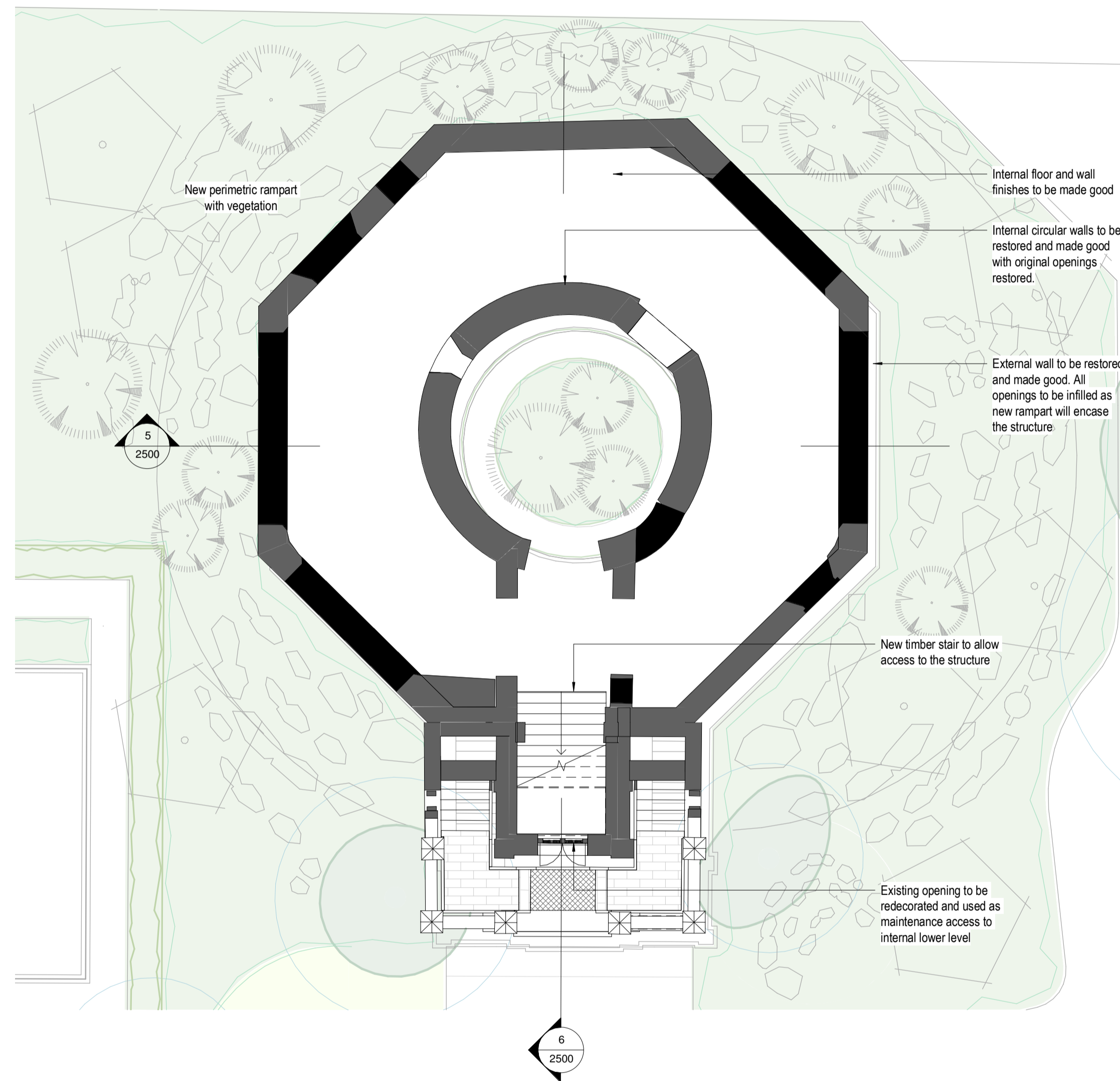
The White Chapel Building  
 10 Whitechapel High Street  
 London E1 6QS  
 020 7250 3477  
 penoyrepsasad.com

Client  
**Bristol, Clifton & West of England  
 Zoological Society Ltd (BCWEZS)**  
 Project  
**Bristol Zoo Gardens**

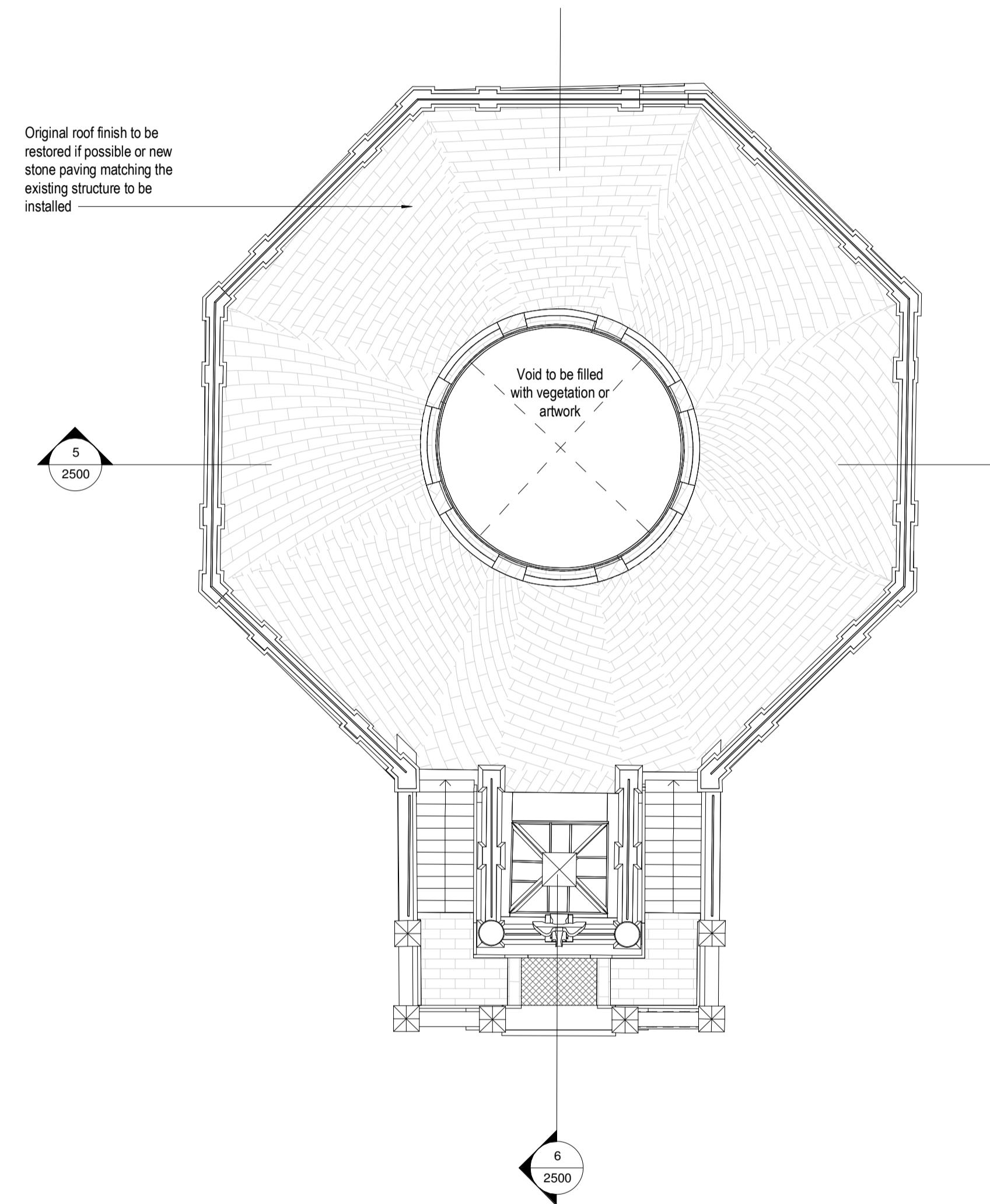
Drawing Title		Scale @ A1	
<b>Clifton Conservation Hub - Proposed Plans</b>		As indicated	
Purpose of Issue Planning			
Status code	Drawing Number		
S2	BZG · PPA · CCH · ZZ · DR · A · 1100		
Project	Originator	Volume	Level Type Role Number
BZG	PPA	CCH	ZZ · DR · A · 1100
Revision			PL1



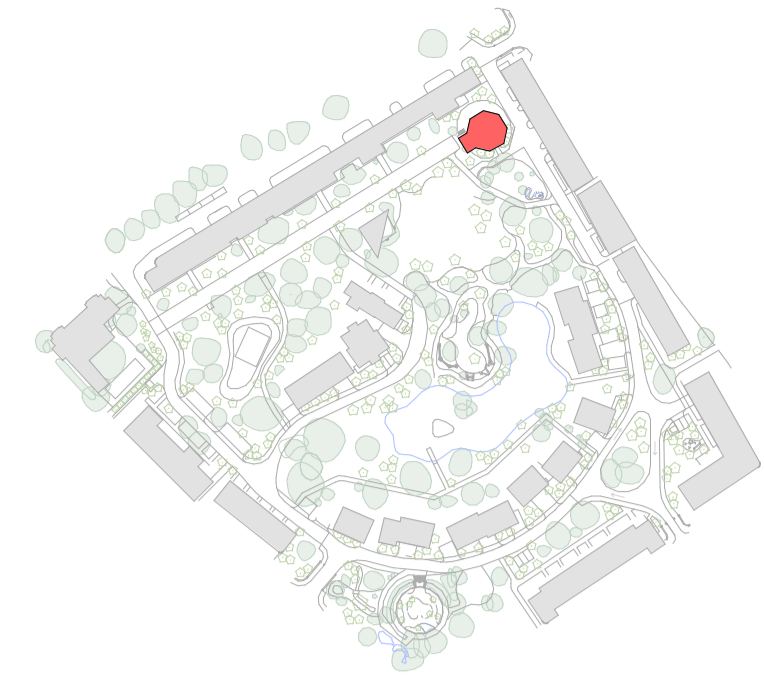




**1 Bear Pit Level 00 - Proposed**  
1 : 100



**2 Bear Pit Roof Level - Proposed**  
1 : 100



© Penoyre & Prasad  
Contractors do not scale from this drawing. Dimensions are to be verified on site prior to construction.  
Ordnance Survey Data reproduced by permission of Ordnance Survey® on behalf of Her Majesty's Stationery Office. © Crown Copyright. All rights reserved.  
Penoyre & Prasad are a trading division of Perkins & Will UK Ltd

**Drawing Legend**

- Existing Building Retained
- New Proposed

NO.	DATE	BY	CHKD	DESCRIPTION



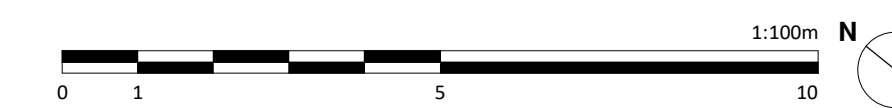
The White Chapel Building  
10 Whitechapel High Street  
London E1 6QS  
020 7250 3477  
penoyreprasad.com

Client  
**Bristol, Clifton & West of England  
Zoological Society Ltd (BCWEZS)**  
Project  
**Bristol Zoo Gardens**

Drawing Title  
**Bear Pit - Proposed Plans**

Purpose of Issue  
**Planning**  
Status code Scale @ A1  
S2 As indicated

Project	Originator	Volume	Level	Type	Role	Number
BZG	PPA	BP	ZZ	DR	A	1101

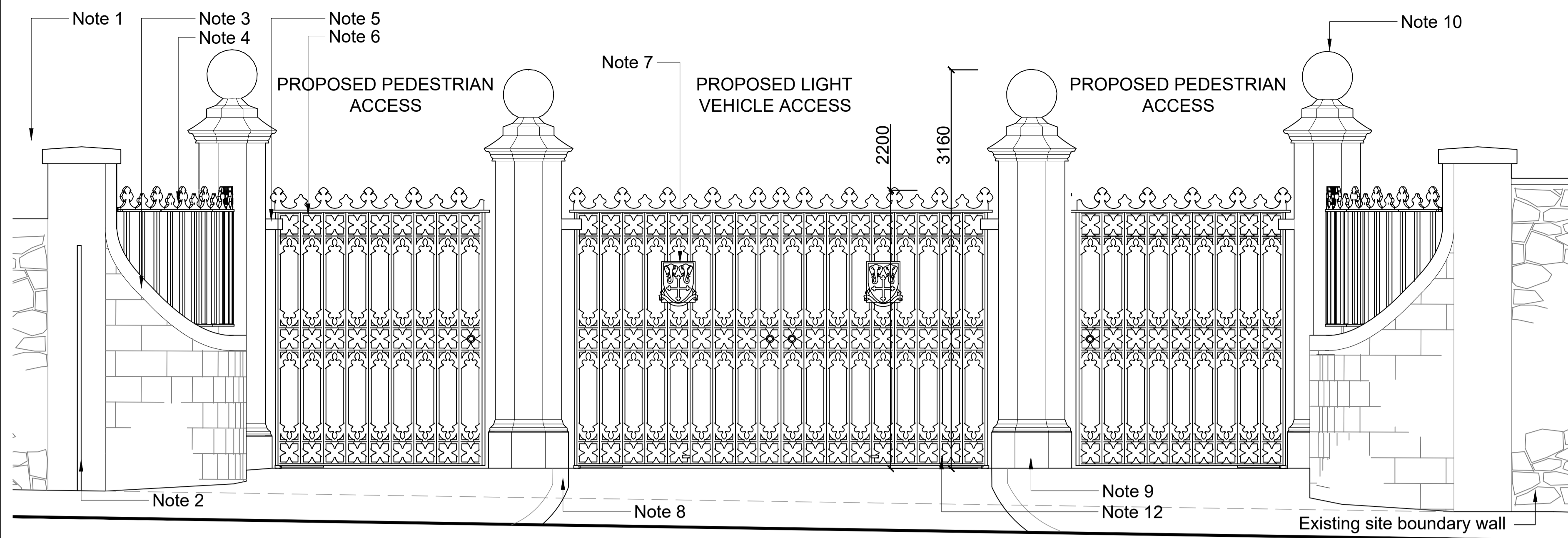




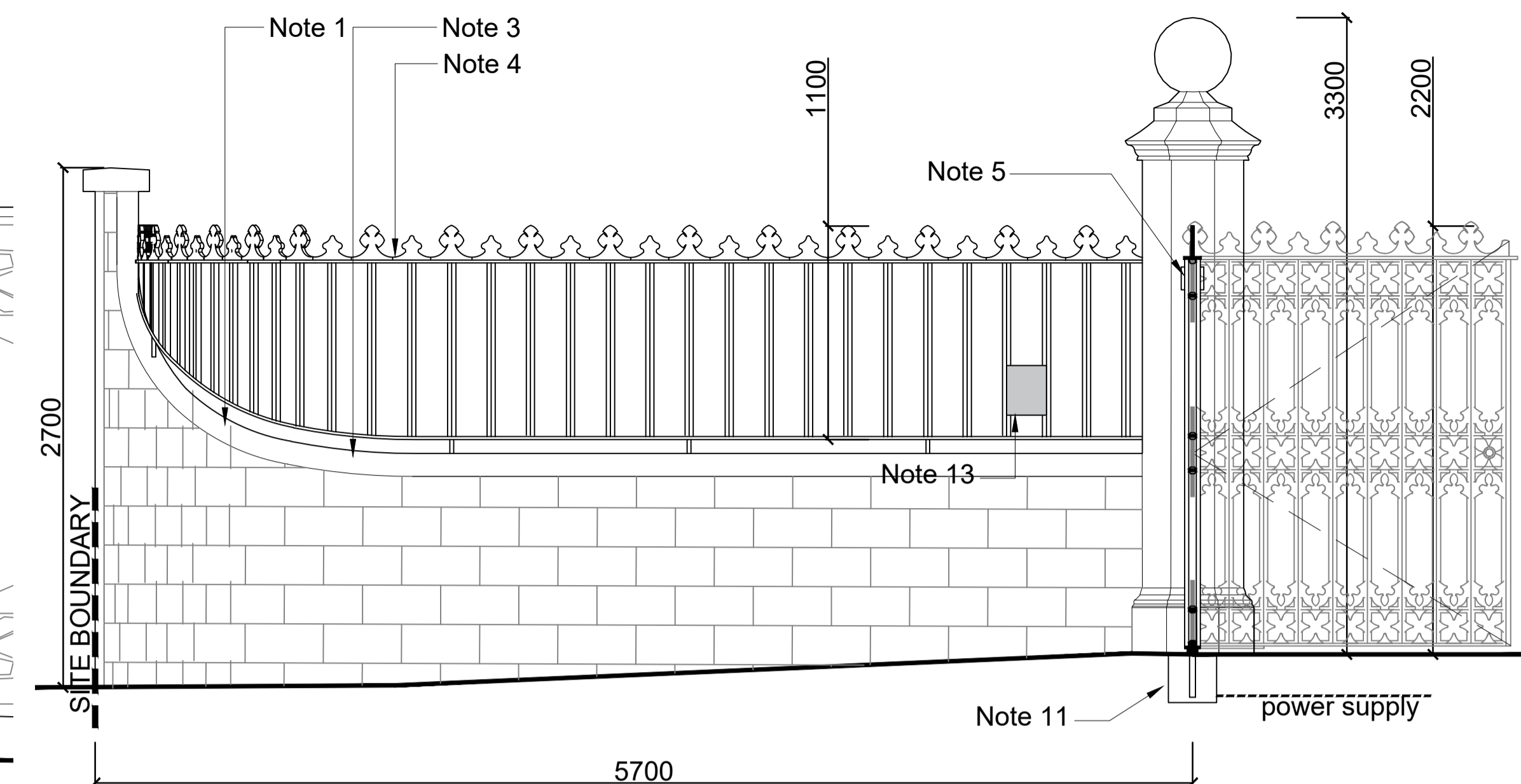








1 Elevation A: Guthrie Road Gates: Proposed  
Scale 1:25@A1



2 Section: Guthrie Road Gates: Proposed  
Scale 1:25@A1

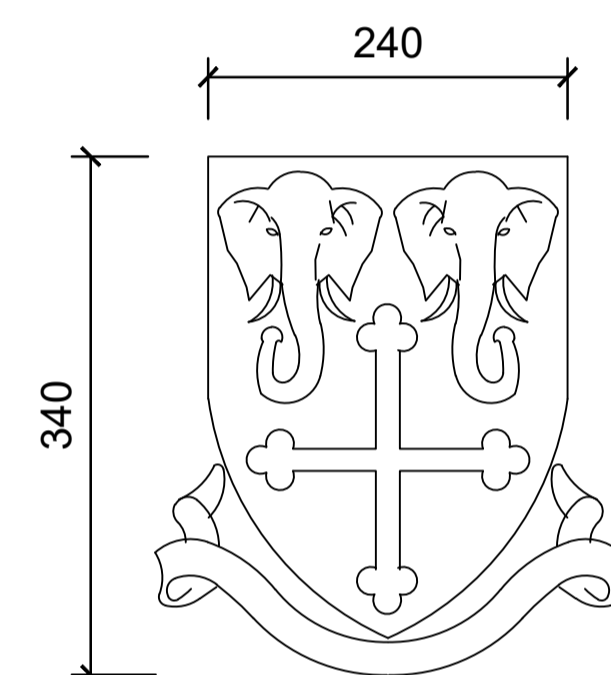
**NOTES**

**General**

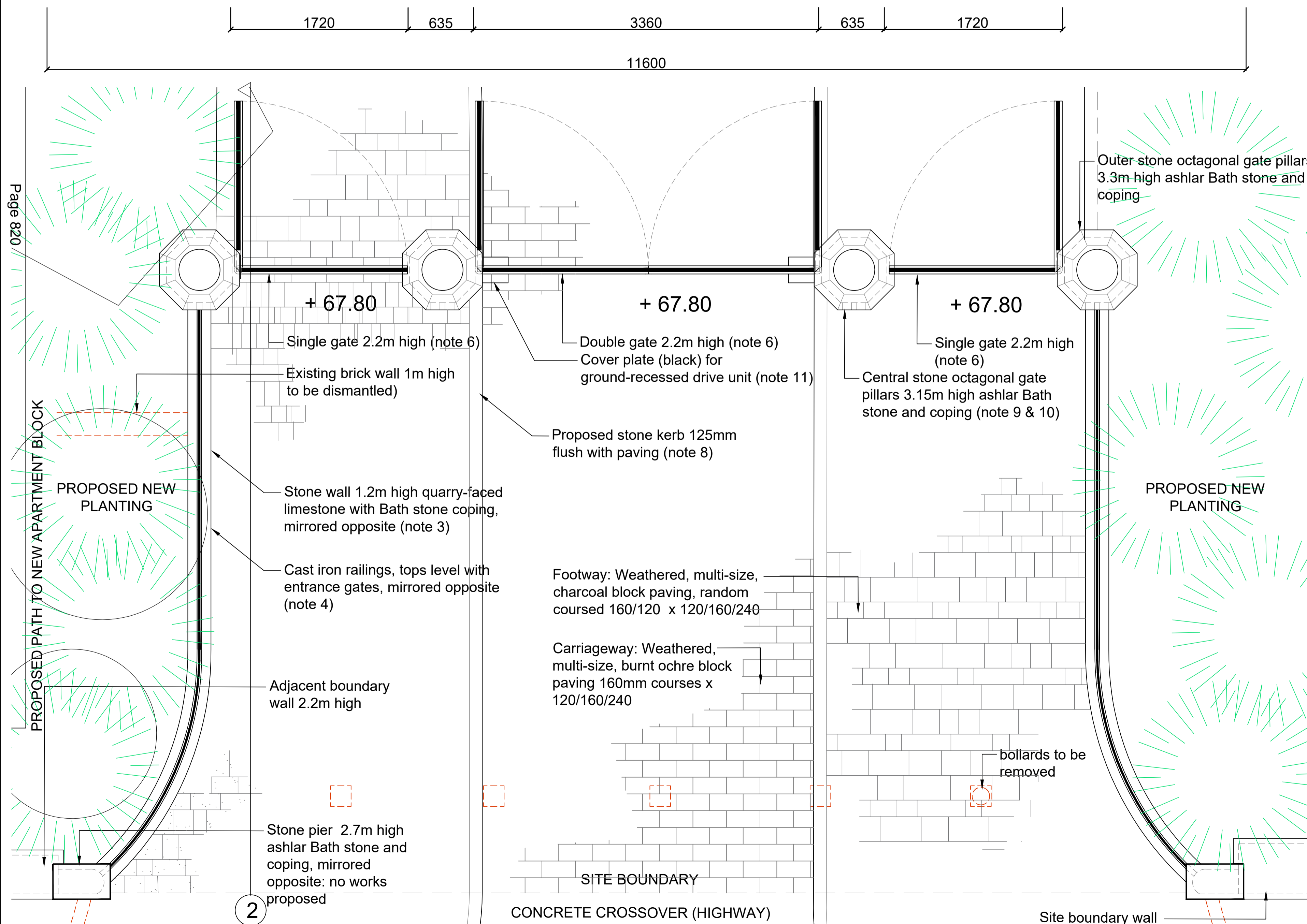
- A. Gates and flanking walls are Grade II listed (1977) listing No. 1279642. They date from c 1850s. The proposal is to conserve the gates and undertake all necessary refurbishment to facilitate automated opening for use by pedestrians and private vehicles accessing the site (in only).
- B. The gates are cast iron, cast in a single piece from a mould.
- C. All the gates have dropped, indicating that the bottom hinge pintles have either worn significantly or rotted away.
- D. Flanking walls are coursed, quarry-faced grey limestone, with Bath stone copings. Joints to side walls are struck mortar and sound; Joints to copings are generally sound with some wear in places.
- E. Gate piers are ashlar Bath stone. Ball finials are believed to be a later addition. Open cavities to stonework around hinge inserts are present.
- F. Evidence of vehicle damage and repair to right hand gate leaf.
- G. Gates and stonework to be restored by suitably qualified metalwork and stone conservators. Full schedule of condition and technical details to be prepared based on site measurements for approval prior to fabrication.

**Proposals Notes**

- 1. All security mesh to be dismantled.
- 2. Conduit to outer pillar to be dismantled.
- 3. Coping stone joints to be raked out and re-pointed with a lime mortar, with brushed back finish.
- 4. Side railings to be repainted insitu with low sheen black exterior grade coating. Gold finials to be re-painted to match existing. Preparation to comprise sanding by hand and 2 part epoxy filling to cosmetic repair of corroded parts. Caulking to be inspected and raked out and replaced as required. Applies to both sides of entrance.
- 5. Gate strap hinges and internal bracket mounting to pier to be replaced with coatings to match existing. Cavity to be cut outs squarely, internal bracket to be chemically anchored into pier cavity (structural detail to be developed) and new matching stone toothed in to fill cavity around gate hinge bracket with lime grout. Brass bushes fitted between gate post and hinges. Applies to all gates.
- 6. All gates to be lifted out for repair and restoration under workshop conditions. Works to comprise sandblasting cleaning all paintwork and abrasions back to clean metal, in preparation for repair and redecoration to match existing with high durability exterior coatings. Cosmetic repairs to be undertaken using 2 part epoxy fillers, rubbed back to align profiles. See note 12 for mechanical repair to damaged gate.
- 7. Existing plaques to be replaced with cast metal hand-painted crests, cast in relief, based on the zoo heraldry, to match new entrance gates located elsewhere on site.
- 8. Proposed stone flush kerbs to demarcate pedestrian and vehicular / surfaces.
- 9. Stone gate pier plinths to be cleaned using a very light jet wash or equal approved method to remove scale and moss deposits.
- 10. Stone ball finials and capping stones to be cleaned using a very light jet wash or equal approved method to remove scale and moss deposits.
- 11. Ground recessed gate drive unit with internal electrical supply connected to a splined gate pintel, operated by fob / card reader for out of hours access. Unit to be programmed to open gates during daytime hours for public access.
- 12. Gate rail repair to comprise routed-out underside to fit a rebated plate with tapped screw fixings to hold parts together. Joint to be made good cosmetically using a 2 part filler.
- 13. Keypad access and fob reader.



4 Crest detail  
Scale 1:5@A1



3 Plan: Guthrie Road Gates: Proposed  
Scale 1:25@A1

**THIS DRAWING TO BE READ IN CONJUNCTION WITH LISTED BUILDING CONSENT DETAILED PROPOSALS DRAWING 11585-LD-PLN-602**

No.	Date	Description	Rev	CHK
A	20.05.22	Planning Application		EP

**LUC** LUC London  
250 Waterloo Road, London, SE1 8RD  
+44 (0)20 7383 5784  
london@landuse.co.uk  
www.landuse.co.uk

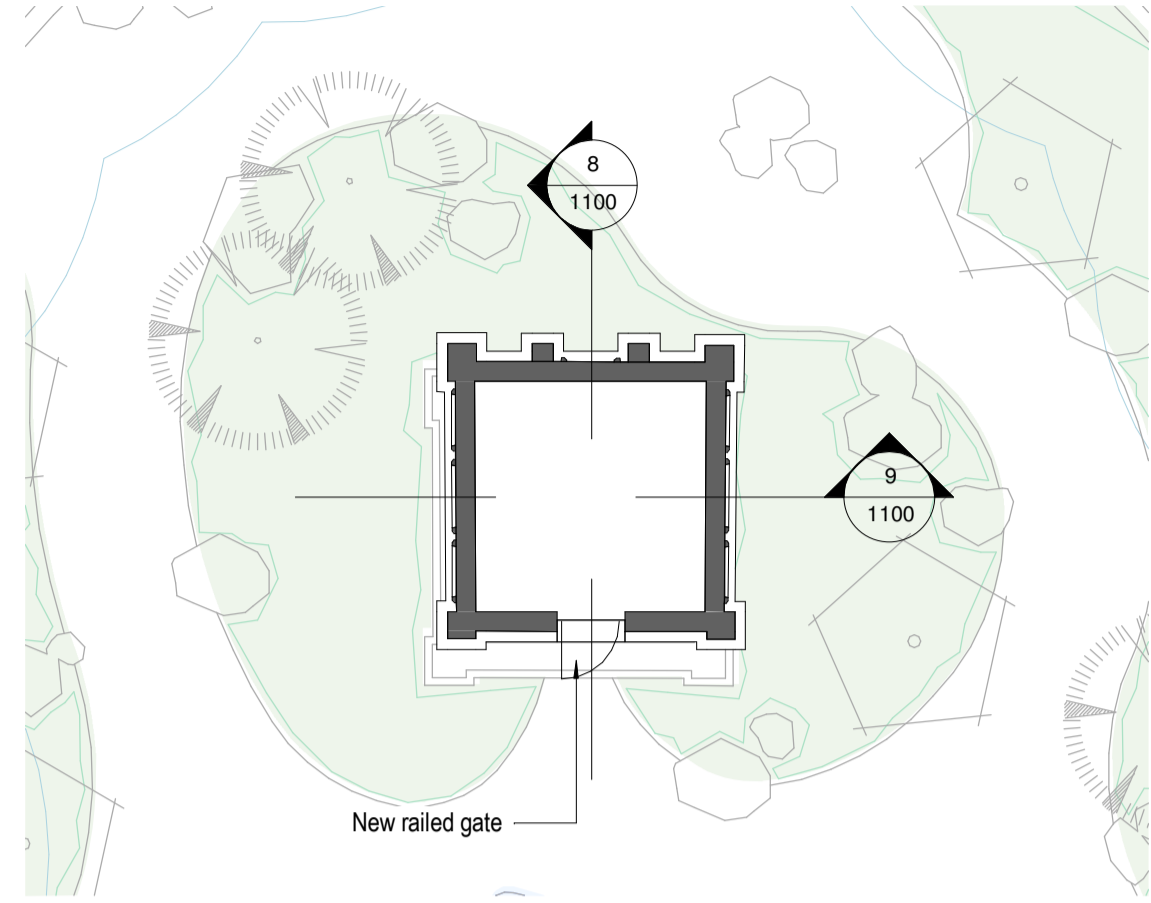
Project  
**Bristol Zoo Gardens (BZG)**

Client  
Bristol, Clifton & West of England Zoological Society Ltd (BCWEZS)

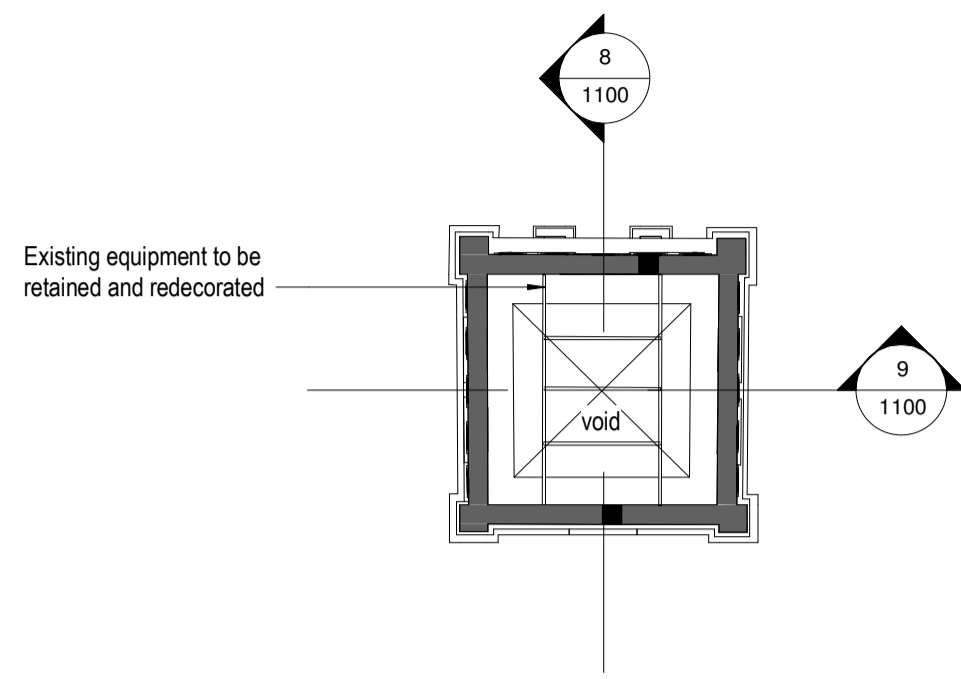
Scale @A1  
1:25  
Status  
PLANNING

Drawing Title  
Listed Building Consent Details  
Guthrie Road Entrance Gates - Proposals

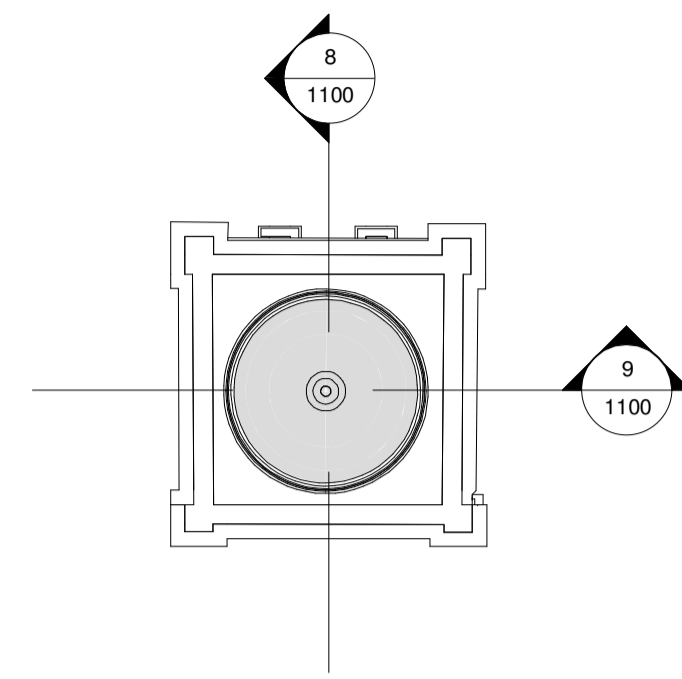
Job Nr	Drawing Nr	Issue
11585	11585-LD-DET-602	A



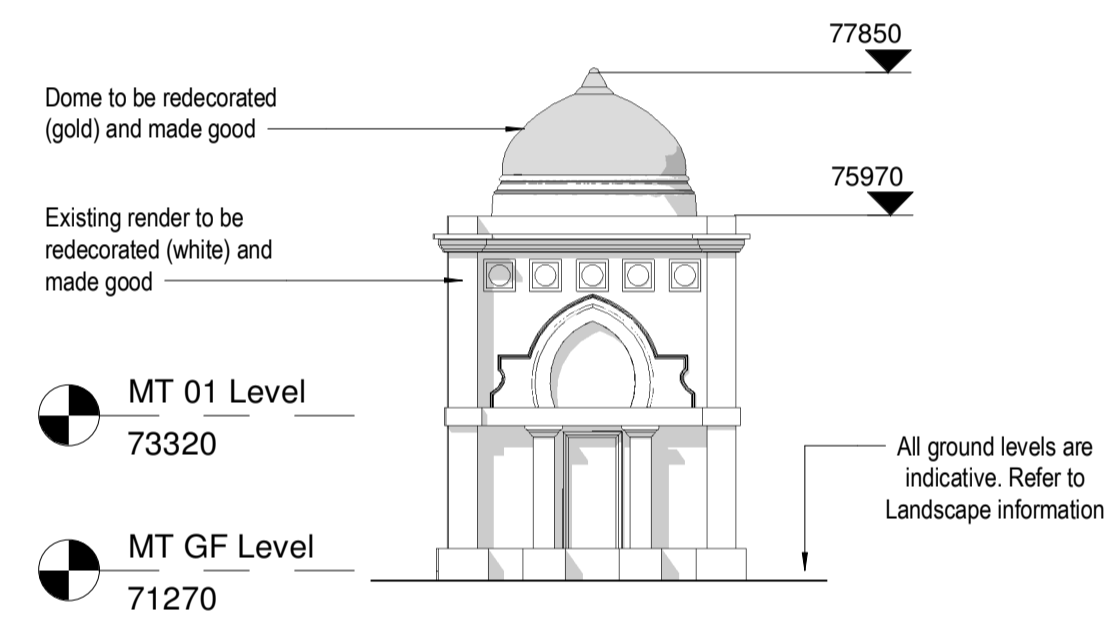
**1 Monkey Temple Level 00 - Proposed**  
1 : 100



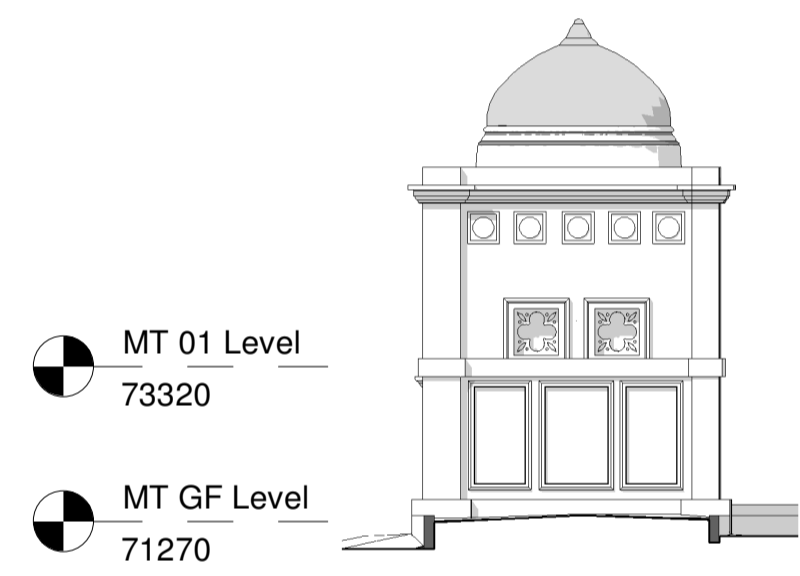
**2 Monkey Temple Upper Level - Proposed**  
1 : 100



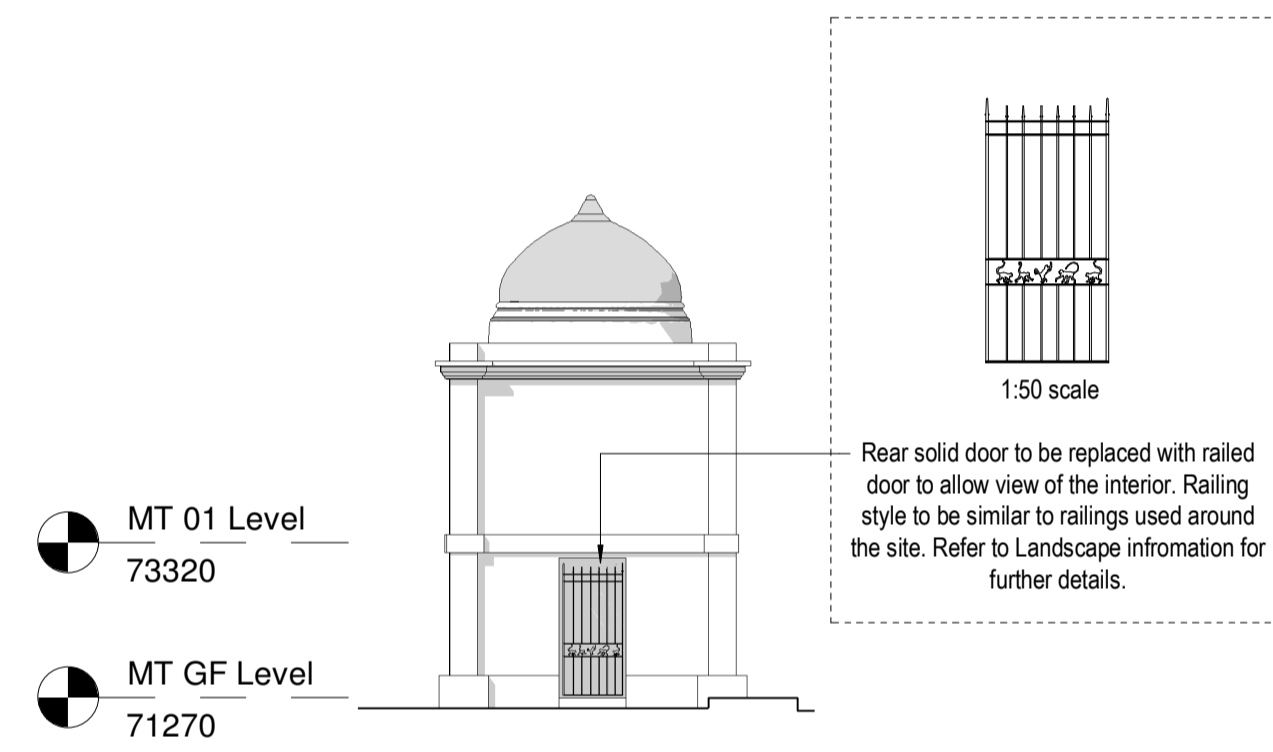
**3 Monkey Temple Roof Level - Proposed**  
1 : 100



**4 Monkey Temple North Elevation - Proposed**  
1 : 100



**5 Monkey Temple East Elevation - Proposed**  
1 : 100



**6 Monkey Temple South Elevation - Proposed**  
1 : 100

NO.	DATE	BY	CHKD	REVISION

**Penoyre & Prasad**

The White Chapel Building  
10 Whitechapel High Street  
London E1 6QS  
020 7250 3477  
penoyrepsasad.com

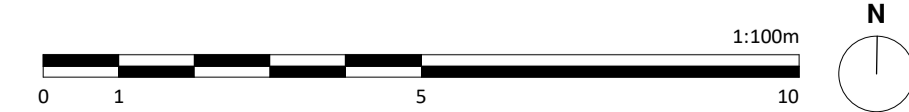
Client  
**Bristol, Clifton & West of England  
Zoological Society Ltd (BCWEZS)**  
Project  
**Bristol Zoo Gardens**

Drawing Title  
**Monkey Temple - Proposed Drawings**

Purpose of Issue  
Planning  
Status code  
S2  
Scale @ A1  
As indicated

Drawing Number	Originator	Volume	Level	Type	Role	Number
BZG	PPA	MT	ZZ	DR	A	1100

Revision  
PL1



**Development Control Committee A – 26 April 2023**

**ITEM NO. 2**

**WARD:** Frome Vale

**SITE ADDRESS:** The Vassall Centre Gill Avenue Bristol BS16 2QQ

**APPLICATION NO:** 22/03476/F Full Planning

**DETERMINATION DEADLINE:** 20 November 2022

**Demolition of existing buildings and redevelopment of Vassall Centre site to provide housing for older people with associated lounge and communal facilities (Class C2), specialist supported housing for people with learning disabilities (Class C2), re-provision of office space referred to as The Hub (Class E(g)(i)), meeting places for the principal use of the local community (Class F2(b)), a nursery, crèche or day centre (Class E(f)) or non-residential training, employability and education centre (Class F1(a)), a cafe (Class E(b)), landscaping and associated car parking.**

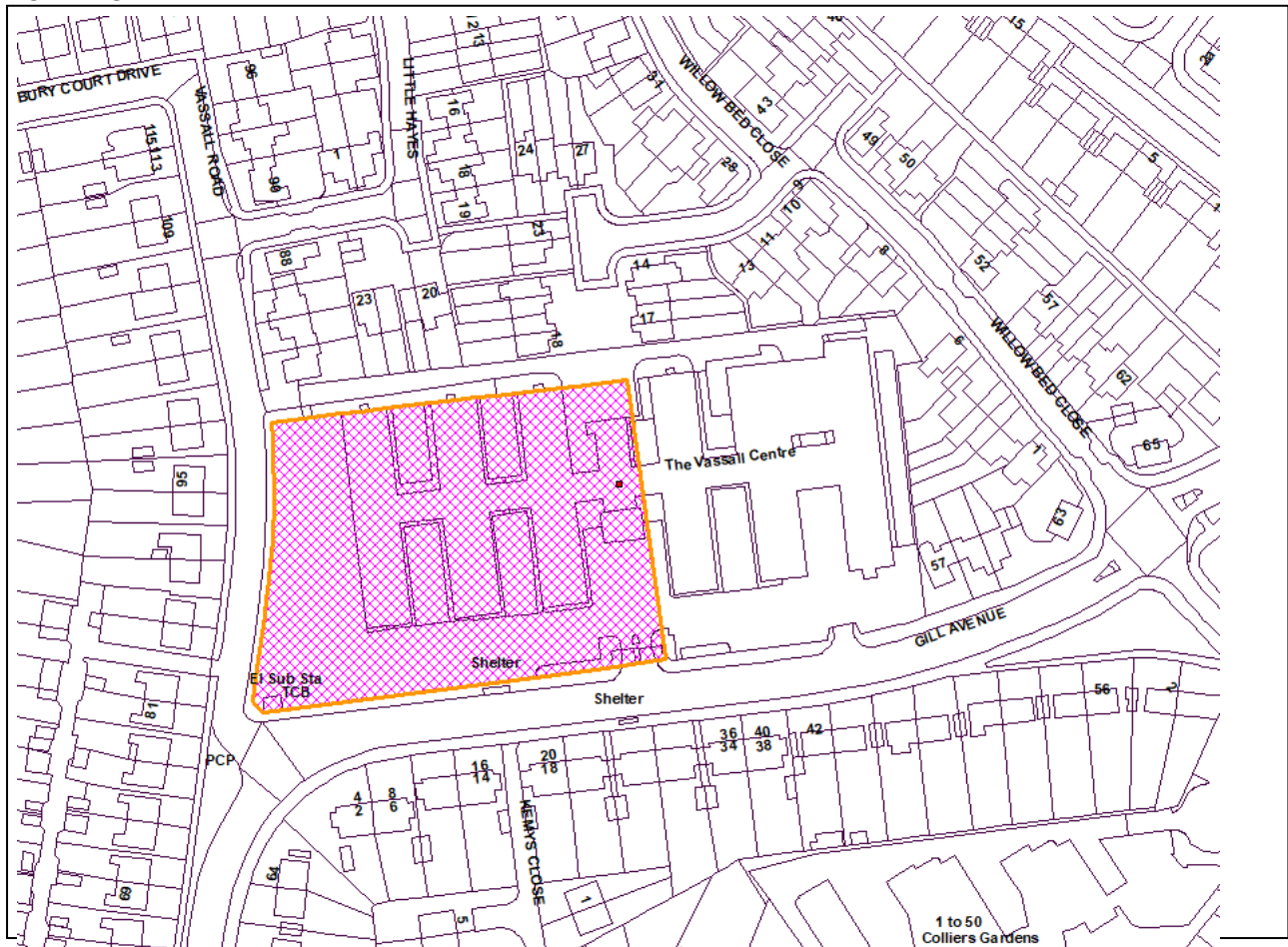
**RECOMMENDATION:** GRANT subject to Planning Agreement

**AGENT:** Alder King Planning Consultants  
Pembroke House  
15 Pembroke Road  
Clifton  
Bristol BS8 3BA

**APPLICANT:** Bristol Charities T/a Orchard Homes

*The following plan is for illustrative purposes only, and cannot be guaranteed to be up to date.*

**LOCATION PLAN:**



**Development Control Committee A – 26 April 2023**  
**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

The application is brought Committee due to 89 Neighbour Objections being received.

## BACKGROUND

The Vassall Centre is located in Fishponds, East Bristol. It is a 5 minute walk from Oldbury Court and a 10 minute walk from central Fishponds Road. The site is bound by Gill Avenue to the South and Vassall Road to the West. The North and East boundaries are land locked, backing onto existing residential gardens.

The existing buildings on the site are used offices, a conference centre and café providing a training facility for people with a range of disabilities and specifically learning disabilities (Class E (a) and (b) (g) (i) and F1 (e)).

The Vassall Centre is an important part of the community infrastructure in Bristol. Not just in the local area or in Fishponds, but City wide - the Vassall Centre has a wide catchment area, even extending beyond the City boundaries. For many years it has been a centre of excellence for disabled people and for charitable organisations that work with/for disabled people.

## PROPOSAL

Demolition of existing buildings and redevelopment of Vassall Centre site to provide housing for older people with associated lounge and communal facilities (Class C2), specialist supported housing for people with learning disabilities (Class C2), re-provision of office space referred to as The Hub (Class E(g)(i)), meeting places for the principal use of the local community (Class F2(b)), a nursery, crèche or day centre (Class E(f)) or non-residential training, employability and education centre (Class F1(a)), a cafe (Class E(b)), landscaping and associated car parking.

## HISTORY

21/05063/PREAPP Proposal: The construction of a mixed use development on the site of the existing Vassall Centre. This is likely to comprise new and improved employment floorspace, intergenerational housing and affordable housing for older and younger people and other facilities that will benefit the local community (potential nursery or element of healthcare provision and new/improved café).

## RESPONSE TO PUBLICITY AND CONSULTATION

A 14 day neighbour re-consultation was undertaken due to amended plans being received relating to a minor change in description of the proposed development.

The former proposed nursery element has been extended to proposed flexible uses of nursery, crèche or day centre (Class E(f)) or non-residential training, employability and education centre (Class F1(a)) to allow flexibility for a potential end user.

Neighbouring properties have been consulted and 89 letters of objection has been received with the following planning issues:

Amenity:

Overlooking

Proximity of the 3 storey building to existing buildings on Vassall's Road.

Loss of light to neighbouring dwellings.

**Development Control Committee A – 26 April 2023**

**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

Design:

Concerns with 3 storey nature of the buildings.  
Flat roof nature of the design.

Parking:

Concerns by residents of lack of parking in the area.  
Highway safety impacted.

Transport:

Inadequate local bus service.

Refuse:

Concerns with bin collection.

Change of Use:

Concerns that part of the site will change from office use to residential accommodation for disabled people.

Concerns of loss of community facilities.

Construction:

Concerns of asbestos in the existing buildings.  
Noise during construction.

Neutrality:

Concerns that Bristol City Council's decision on the application is not neutral on the application as they are involved in renting some of the units.

Concerns that the details on the person dealing with application at BCC have been redacted.

Consultation:

Concerns that consultations were not undertaken properly.

Nature conservation:

Concern that there is no bat survey.  
Concern that noise and pollution will affect wildlife on site.

Impact on water pressure.

Bristol Civic Society

Objection – concerns with the scale and massing and how it would articulate with the surrounding area.

Transport Development Management (TDM)

No objections subject to conditions.

Contaminated Land

No objections subject to condition including an intrusive site investigation prior to commencement.

Sustainable Cities

No objections subject to conditions.

Environmental Protection

No Objections subject to conditioning a CMP.



**Development Control Committee A – 26 April 2023**

**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

Tree Officer

No objections subject to conditions

Housing Enabling Manager

No objections

Site is 100% affordable Housing for Social rent providing much needed single person 1 bedroom accommodation which is lacking citywide.

Crime Prevention Officer

Some concerns raised regarding lack of natural surveillance

Avon Fire & Rescue Service

Has requested the installation of x2 Fire Hydrants and has calculated the cost of installation and five years maintenance of a Fire Hydrant to be £1,500 + vat. This will be included in the S106 agreement.

Nature Conservation

No objections

A Biodiversity Net Gain Assessment that assesses the level of enhancement is also included with this application. This shows a net-gain in biodiversity following completion of the development.

Flood Risk Manager

SUDS Calculations require updating otherwise no objections.

Community Buildings Manager

Concerns that the redevelopment will not provide sufficient replacement community facilities.

Ward Members

No objection received consultation period expired.

## RELEVANT POLICIES

National Planning Policy Framework – July 2021

Bristol Local Plan comprising Core Strategy (Adopted June 2011), Site Allocations and Development Management Policies (Adopted July 2014) and (as appropriate) the Bristol Central Area Plan (Adopted March 2015) and (as appropriate) the Old Market Quarter Neighbourhood Development Plan 2016 and Lawrence Weston Neighbourhood Development Plan 2017 and the Hengrove and Whitchurch Park Neighbourhood Development Plan 2019.

In determining this application, the Local Planning Authority has had regard to all relevant policies of the Bristol Local Plan and relevant guidance.

## KEY ISSUES

### A) PRINCIPLE OF DEVELOPMENT – PROTECTION OF COMMUNITY FACILITIES

Core Strategy policy BCS12 sets out the general approach to the protection of community facilities. This Development Management policy sets out more detailed criteria to determine the importance of the facility. This includes assessment of the need or demand for community facilities, the suitability of the site or building for a community facility, whether the facility could form part of the new development or whether alternative provision might be more appropriate.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

The term community facilities is wide-ranging and can include community centres and childcare facilities, cultural centres and venues, places of worship, education establishments and training centres, health and social care facilities, sport and recreation facilities and civic and administrative facilities. It may also include other uses whose primary function is commercial but perform a social or community role i.e. sport, recreational and leisure facilities including local pubs.

Community facilities include all uses, commercial or non-commercial, that provide a social or welfare benefit to the community. Whilst protection is sought for all uses that meet this definition, community land and buildings are particularly important. This includes land and buildings that are managed, occupied or used primarily by the voluntary and community sector for community-led activities for community benefit.

When making an assessment of the importance of the community facility consideration should be given to: Local need and demand for the existing community facility or other community facilities that are willing and able to make use of the building g(s) or land; The extent and quality of local provision of the existing community facility; The nature, pattern and frequency of activities taking place at the site; Its contribution to the diversity of community facilities in the e locality; The accessibility of the site and other local community facilities by walking, cycling and public transport; In the case of commercial community facilities, whether the use is no longer viable (applicants will need to submit evidence to demonstrate that the site is no longer viable for that use and has been adequately marketed. The latter should be undertaken in accordance with the guidelines on the carrying out of marketing which are available to view on the council's website under planning advice and guidance.); Whether the site or building has been listed as an asset of community value.

A range of data sources including the Community Buildings Audit and Explore Bristol interactive mapping, available on the council's website under community centres and facilities, can be used to understand the extent and distribution of Community Facility provision within a locality. The extent of the locality should relate to the nature and catchment of the community use. Where relevant, consideration should also be given to the suitability of the site for the current use or for other community facilities, including costs associated with any works to adapt the site. Important community facilities that cannot be accommodated on the existing site should form part of any redevelopment or be provided in a suitable alternative location.

The main concern relating to the principle of the development would be the loss of the Vassall Centre, which is considered a community facility. Policy DM5: Protection of Community Facilities requires proposals involving the loss of community buildings and land will not be permitted unless the following is demonstrated:

- i. The loss of the existing community use would not create, or add to, a shortfall in the provision or quality of such uses within the locality or, where the use has ceased, that there is no need or demand for any other suitable community facility that is willing or able to make use of the building(s) or land; or
  - ii. The building or land is no longer suitable to accommodate the current community use and cannot be retained or sensitively adapted to accommodate other community facilities; or
  - iii. The community facility can be fully retained, enhanced or reinstated as part of any redevelopment of the building or land; or
  - iv. Appropriate replacement community facilities are provided in a suitable alternative location.
- The applicant will be required to carry out an assessment of this issue to support the planning application.

The existing buildings on the site are used offices, a conference centre and café providing a training facility for people with a range of disabilities and specifically learning disabilities (Class E (a) and (b) (g) (i) and F1 (e)).

The Vassall Centre provides a barrier-free workplace for people with disabilities and has supported employment and training facilities over the years to a number of important and well-known charities, social enterprises and not for profit organisations. Bristol Charities purchased the site in April 2021

**Development Control Committee A – 26 April 2023**  
**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

and is continuing to manage the office accommodation and retaining all current tenancies listed above. The existing building includes offices, workspace for disabled people, a conference centre and café providing a training facility for people with a range of disabilities and specifically learning disabilities. The existing buildings are at the end of their practical life-span and have very poor environmental performance.

The redevelopment of the Vassall Centre site provides an opportunity to retain and improve on the services provided at the Vassall Centre to better serve the local community, while making more effective use of the site for tenants, people with disabilities, older people and those in need of affordable family homes and local residents. The provision of 100% affordable family housing will be provided in Phase 2 of the project; this would be over and above Policy compliance for affordable housing. Phase 2 cannot be considered within this application however Phase 1 of the development is intended to cover the loss of community uses for the wider site. Connectivity and future proofing of the development can be considered so that it logically links to Phase 2 this will be covered further on the report.

Phase 1 it is proposed to include the following:

Housing for older people with associated lounge and communal facilities (Class C2 – residential institution) – this will comprise approximately 40 units with a mixture of 1 bed and 2 bed units (3423 sqm);

Specialist Supported Housing for people with learning disabilities (Class C2 – residential institution) – this will comprise 8 x 1 bedroom units (662 sqm);

2116 sq m Class E (g)(i) (re-provided office space referred to as “The Hub”);

353 sq m Class F2 (b) (meeting places for the principal use of the local community) - this is known as “community space” on the ground floor of the Gateway building;

294 sq m Flexible Uses: a nursery, crèche or day centre (Class E(f)) or non-residential training, employability and education centre (Class F1(a)), a cafe (Class E(b));

77m<sup>2</sup> sq m Class E (b) (café).

The existing floorspace within the application site is 1,377sq m which is over 50 per cent of the wider site. The proposal will re-provided office space referred to as “The Hub” and provide a total of 2116sq m of community use office space. In addition to this 353 sq m Class F2 (b) (meeting places for the principal use of the local community) and 294 sq m Flexible Uses: a nursery, crèche or day centre (Class E(f)) or non-residential training, employability and education centre (Class F1(a)), a cafe (Class E(b)). These two proposed uses would also be considered community uses therefore the proposal would provide 2763sq m of community uses. This is considered an appropriate amount of floorspace which would replace the existing centre which is considered inefficient.

The existing list of Vassall Centre tenants mentioned in the planning statement will use surplus space in the existing buildings shown in the Phase 2 area until Phase 1 has been completed – this therefore avoids any disruption/unnecessary displacement. Bristol Charities have been working to accommodate tenants that wish to remain at the Vassall Centre in the new accessible hub.

Concerns have been raised that the conference centre within the existing centre will be lost. The ‘Hub’ building will be a 3 storey height building with a community café on the ground floor with bookable meeting space and ‘lettable’ space on levels 1 and 2. The Gateway Building includes bookable community space at ground floor level.

The vision for the site is to create a mixed use, multigenerational development that encourages interaction between the different stakeholders and promotes a healthy inclusive community, whilst retaining and re-providing new, better-quality employment (office) space. In the context of policy DM5 (protection of community facilities) and BCS12 (community facilities generally), the proposed Site Plan shows careful thought has been given to a mix of uses at the site. In this case, providing much needed housing for older people and specialist housing for people with learning disabilities in Phase 1

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

alongside new and re-provided employment office space and community related uses such as the retained/improved café but also other proposed ground floor uses like the nursery and lettable community space within the 'Gateway' building. Therefore, on the basis of reinstating the café use and introducing other new community facilities, Bristol Charities feel that they would be able to satisfy criteria iii of policy DM5 which states 'the community facilities can be fully retained, enhanced or reinstated as part of any redevelopment of the building or land.'

It is therefore considered that appropriate replacement community facilities are provided within the site. Given the alternatives provided it is considered that the loss of the existing community use would not create, or add to, a shortfall in the provision or quality of such uses within the locality.

The proposal is considered to comply with Policy DM5 iii as the community facility can be fully reinstated as part of any redevelopment of the land and is therefore considered acceptable.

i) PROVISION OF C2 USE.

This proposal is in part for a nursing and residential elderly care home. It falls under Use Class (C2) which states:

"Use for the provision of residential accommodation and care to people in need of care (other than a use within a class C3 (dwelling house). Use as a hospital or nursing home..."

Bristol Local Plan - Comprising the Bristol Development Framework Core Strategy (June 2011) and the Site Allocations and Development Management Policies (July 2014)

Policy BCS20 underlines the importance of efficient use of previously developed land. Higher densities of development are encouraged at local centres and along main public transport routes.

Policy DM2 from the Site Allocations and Development Management Policies gives greater detail on the mix and location of various housing types across the City. It requires that Older Persons' Housing Schemes should be located close to shops and services and close to good public transport links. It also notes that "accommodation for older persons will be acceptable on all sites allocated for housing subject to the policy criteria."

Policy DM1 (Presumption in Favour of Sustainable Development) of the SADMP outlines that the city's approach to development proposals will generally be positive and reflective of the presumption in favour of sustainable development as referenced throughout the NPPF.

The East area's proportion of people 65 or over is higher than the Bristol population average (13%) at 14% of the wards population. It is estimated that by 2035 the central east of Bristol will need 607 properties for older people and 140 dwellings with extra care facilities. It was acknowledged that the proposed development will provide additional units built to extra care standards that are needed in the area and provide a means of offering support to the wider community.

Residential provision both in the form of a residential care home/retirement home and residential dwellings are also considered acceptable at the site in line with Policy SA1. The residential care home/retirement home provision is particularly welcomed given the current need.

The proposal represents the appropriate re-use of a previously developed site that is situated in a sustainable location in East Bristol in line with Policy BCS20 of the Core Strategy. The development also complies with Policies BCS10 and BCS12 which require community facilities to be located in accessible areas with a choice of transport available and in a location where sustainable travel patterns can be achieved. The easy access onto the main arterial road network and the proximity of local bus stops within 200m of the site access make this site a wholly sustainable option. Policy DM2 of the Site Allocations and Development Management Policies requires older persons' housing to be located in close proximity to shops and services and good transport links. The location adjacent to the shops and facilities of the wider Fishponds area as well as the easy car and bus links to the wider transport network make this site ideal and fully compatible with the aims of policy DM2.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

The original Vassall Centre buildings are single storey and were built in 1945 as a base for American soldiers during the Second World War. By redeveloping the site and increasing the density of development, the overall building footprint (as existing) can be reduced which would make more efficient use of the site in accordance with paragraph 124 of the NPPF. This means there is the opportunity to release some of the site to provide further employment, new community uses, housing for older people and specialist housing for people with learning disabilities as part of the first phase of redevelopment followed by affordable houses and apartments as part of the second phase to the redevelopment. Both phases will benefit from landscaped areas and accessible public open space.

The existing site is commercial and is located within mainly residential area. It is located on a main bus route into and out of the city centre. It is in a sustainable location where national and local plan policies encourage the more efficient use of land, subsequently the redevelopment of the site for C2 Care Facilities is acceptable in principle.

**B) ECOLOGY**

Policy DM19 is relevant which requires any loss of nature conservation value to be either mitigated on site or off site.

Almost all of the survey area is of minimal nature conservation value and there would be no significant ecological impact associated with re-development on most of the site. There would be a minor adverse impact associated with the loss of a small area of semi-improved grassland.

There will be a minor loss of badger foraging habitat. This is unlikely to have any significant impact on the social group of badgers using the site. No other impact on protected species has been identified but measures to prevent harm to hedgehogs and nesting birds would be required whilst the site is being developed.

There are several opportunities to provide ecological enhancement on the site. The re-development proposals include several measures that will make a positive contribution to the biodiversity value of the local area, including contributions to the aims of biodiversity action plans. These measures include the following: Tree and shrub planting, to include native tree and shrub species and other species of value for birds, insects and other wildlife. The creation of significant areas of species-rich planting, which will provide habitats of value for invertebrates and other wildlife. The inclusion of species of value for insects in ornamental planting schemes. Planting of creepers to create green walls. Provision of built-in swift and bat boxes and insect hotels. The above measures have been conditioned.

A Biodiversity Net Gain (BNG) analysis has been carried out using the Defra (3.1) Metric. This assessment covers only Phase 1 of the scheme. The calculations are summarised at Appendix 2. The baseline scores for the site are: Habitat-based units: 0.29 Hedge units: 0.16. These low figures reflect the built-up current nature of the site and the absence of any native-dominated hedge. The more diverse grassland has been classified as “other neutral grassland” and the less diverse grasslands as “modified grassland”, as dictated by their species mixture. The post-intervention scores for the site area: Habitat-based units: 0.34 Hedge units: 0.43 The result of these measures are positive changes of 15.91% in Habitat Units and 169.72% in Hedgerow Units.

This improvement is due to the significant areas of planting on the site. The planting has been classified as “vegetate garden”, although as proposals are developed it may qualify as a more valuable habitat type.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

The site is not covered by any statutory of local wildlife designations. The buildings are all of a single layer construction with rendered walls. None has any roof space: most are flat-roofed and the one building with a pitched roof is entirely open to the roof. They are all in active use and are well maintained, with door and window frames tight-fitting. The Ecological survey has not made any suggestion of any Bat Survey's due to this.

With the suggested conditions the proposed impact on ecology is not considered detrimental.

**C) CONTAMINATION**

Policy DM34 in the Site Allocations and Development Management Policies (2014) states that new development should demonstrate that:

i. Any existing contamination of the land will be addressed by appropriate mitigation measures to ensure that the site is suitable for the proposed use and that there is no unacceptable risk of pollution within the site or in the surrounding area; and

ii. The proposed development will not cause the land to become contaminated, to the detriment of future use

Based on the assessment carried out to date, it is clear that suitable site remediation works can be undertaken to ensure that the contamination, and subsequently the risk to human health, is eliminated from the site in line with policy DM34.

Following consultation, the Council's Contaminated Land team confirmed that the proposed development is acceptable following conditions.

**D) IS THE IMPACT ON TREES ACCEPTABLE?**

Policy DM17 of the Development Management Policies refers to the integration of existing trees into development. It states that where tree loss is accepted, replacement provision in line with the Bristol Tree Replacement Standard (BTRS) should be provided.

Eight trees will need to be removed in order to construct the proposed development, these include two B-grade trees (T1 & T2) and six C-grade trees (T3–T8). Two hedges (H1 & H10) will also need to be removed and two further hedges (H2 & H4) will need to be partially removed, these have all been classified as C-grade arboricultural features. It will be necessary to compensate for the trees that will be lost as part of new development in order to meet the requirements of Bristol City Council Policy DM17.

In accordance with Policy DM17, five new trees will need to be planted to compensate for the eight trees that would be lost as part of the proposed development. Only 5 trees would be required 3 T1 and 2 T2 as the other trees are only Cat C1.

The applicant proposes to plant an abundance of new trees around the site which will easily exceed the five trees that are required, the locations of these tree are shown on the 'Landscape General Arrangement Plan' which accompanies this submission. A detailed Landscaping specification Plan has been conditioned in order to cover this.

The Tree officer has no objections to the proposal subject to Conditions.

The proposal will have a positive impact on the area due the new proposed tree planting.

**E) IS THE DESIGN OF THE PROPOSAL ACCEPTABLE?**

Section 12 of the NPPF outlines the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

development acceptable to communities. Being clear about design expectations, and how these will be tested is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

Policy BCS21 (Quality Urban Design) of the Core Strategy advocates that new development should deliver high quality urban design that contributes positively to an area's character and identity, whilst safeguarding the amenity of existing development.

Policy DM26 (Local Character & Distinctiveness) of the SADMP expands upon Core Strategy Policy BCS21 by outlining the criteria against which a development's response to local character and distinctiveness will be assessed. Development will not be permitted where it would be harmful to local character and distinctiveness or where it would fail to take the opportunities available to improve the character and quality of the area and the way it functions.

Policy DM27 (Layout and Form) of the SADMP outlines that the layout, form, pattern and arrangement of streets, open spaces, development blocks, buildings and landscapes should contribute to the creation of quality urban design and healthy, safe and sustainable places. It should make efficient use of land, provide inclusive access and take account of local climatic conditions.

Policy DM29 (Design of New Buildings) of the SADMP states the design of new buildings should be of high quality. Buildings should reflect their function and role appropriately within the public realm and be capable of adaptation to accommodate alternate uses and future needs. New buildings should incorporate active frontages, have clearly defined main entrances fronting the public realm, incorporate exteriors and elevations which provide visual interest from a range of viewing distances, be visually well organised and well proportioned.

The site is located directly to the north of the Oldbury Court Estate, a residential development built in the mid-20th century which consists mainly of 2-storey semi-detached or terraced houses. Houses in the neighbourhood surrounding the Vassall Centre are of traditional masonry construction, finished in red/buff brick or white/cream render, with the occasional use of reconstituted stone and timber cladding. Typically, the main roofs are tiled with concrete double pantiles. Furthermore, the application site is in a predominantly residential area surrounded by 2 storey semi-detached housing interspersed with other building typologies including some 3 and 4 storey apartments and a care home.

Gill Avenue to the South of the site is characterised by a wide road and pavements lined with large 2 storey, semi-detached houses with long front gardens. To the East of the site there is 4no. 3 storey apartment blocks angled away from the road. Whilst there is a variety of window proportions and styles, the windows are predominantly a horizontal proportion with a high sill. Along Gill Avenue the materials are mostly buff render with some red brick on the apartment building and brown roof tiles.

Vassall Road to the West of the site connects Fishponds Road to Olbury Court. The road is wide with grass verges and trees towards Fishponds Road but becomes narrower adjacent to the site. Vassall Road is characterised by 2 storey, semi-detached houses with bay windows and driveways. The houses on the lower part of Vassall Road are larger than the houses adjacent to the site. The lower part of Vassall Road is predominantly buff render. The upper part is predominantly red brick. The site currently has a poor relationship to the street. The buildings are set far back from the road and lack street presence. This makes it difficult for people who are unfamiliar with the site to know what facilities and services it offers.

The proposed redevelopment will create a new neighbourhood centre and include different building typologies that reflect the intermediate context. Whilst the proposed buildings are larger than the surrounding houses, the massing has been broken down both horizontally, with recessed balconies and vertically, by introducing a different material on the top floor. This helps maintain a domestic feel to the development.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

The Urban Living SPD is a material consideration in the determination of planning applications. Fishponds falls in the 'Outer Urban Area'. Residential densities are low (typically 30 dwellings per hectare). These low densities have significantly undermined the ability of the area to deliver a range of services within a reasonable walking distance of the home, resulting in high reliance on the car. There have been other successful examples within Bristol of where higher density mixed use development has been provided in 'Outer Urban Areas'. Urban infill schemes emerging in areas like Lockleaze, Fishponds and Southmead. Schemes like Gainsborough Square demonstrate the potential of focussing small-scale, but higher than the prevailing density developments at the focal points in a community. The design of the scheme at a higher density is considered to result in a more effective use of the land and is welcomed.

Proposed public open space provides a focal point within the centre of the site, delivering a verdant character that will significantly enhance the quality of the development.

Given the width of the road and separation distances from adjacent developments the proposed height of the proposed development is considered acceptable.

The design incorporates flat roof buildings keep the overall heights down so the 3 storey massing is not significantly taller than the surrounding 2 storey pitched roof houses.

The proposed scale mass and design is considered inkeeping with the character and appearance of the wider area. The proposal is considered an improvement over the existing buildings and will provide a positive contribution to the streetscene. The proposed design is considered acceptable.

**F) WILL THE DEVELOPMENT PROVIDE SATISFACTORY ACCOMMODATION?**

There will be 40 no. 1 and 2 bedroom apartments, operated by Bristol Charities, for older people from across Bristol who are in need.

The majority of people Bristol Charities supports are on the lowest incomes or housing benefit. The proposed housing for older people will be let at affordable rents. The housing for older people has been organised around a landscaped courtyard and will be accessed via an open gallery circulation. This approach to the layout enables dual aspect homes with good daylight, ventilation and visual connection to the courtyard and neighbouring streets to be achieved.

The housing for older people has been designed to HAPPI standards and to Extra Care Standards, creating the option to provide housing for older people with care needs. It has been designed in a way to enable a strong connection to the communal area which provides increased opportunity for engagement with social activities. 25% of the apartments have been designed to be wheelchair accessible with a communal lounge and south facing roof terrace that should encourage interaction between residents and help combat loneliness.

In the same way as their other schemes, Bristol Charities will be responsible for the maintenance of the building(s), providing housing management services, a low level alarm service, and Housing Support and therefore consider the proposed Use Class to be C2.

There will be 8 one bedroom apartments on floors two and three of the Gateway building providing eight units of specialist supported housing that will be made available by Bristol Charities to residents with complex support needs. These homes will be serviced by ancillary office, staff sleeping provision and communal space, provided in the footprint of one of the dwelling units. This housing offer has been designed to reflect the varied and complex housing needs of people with a range of differing physical abilities and wider support needs, addressing accessibility, sensory and enhanced safety requirements whilst delivering each resident their own home and an opportunity for independent living.



**Development Control Committee A – 26 April 2023**  
**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

The proposed residential care home and specialist accommodation is considered to provide satisfactory accommodation for its residents.

G) WILL THE PROPOSAL HAVE AN ADVERSE IMPACT ON NEIGHBOUR AMENITY?

Section 8 of the NPPF outlines decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Policy BCS21 (Quality Urban Design) of the Bristol Core Strategy advocates that new development should give consideration to matters of neighbouring privacy, outlook and natural lighting. Policy DM29 (Design of New Buildings) of the SADMP states the design of new buildings should be of high quality. To achieve this, new buildings are expected to ensure that existing and proposed development achieves appropriate levels of privacy, outlook and daylight.

i) IMPACT ON PRIVACY

To the North of the site car parking separates the proposed buildings from existing residential dwellings. The nearest point of the proposed buildings is around 14 metres from the side Boundary at No.82 Vassall Road and No.19 Willow Bed Close. Both dwellings have blank side elevations and there would be no unacceptable overlooking to these dwellings or the garden from the proposed development.

The rear of the proposed buildings are around 30 metres from the rear elevations of the existing dwellings on Little Hayes.

The proposed C2 apartments are around 21 metres from the existing dwellings to the West across Vassall's Road. It is considered that the submitted plans show sufficient detail in order to gauge any potential impact on neighbour amenity; it is considered that there are adequate separation distances between neighbouring properties within the development given the measures outlined above. The proposal is not considered to result in overlooking to neighbour amenity to a level that would be detrimental to living conditions.

ii) IMPACT ON LIGHT

In order to properly inform the design, siting and proposed massing of the new Vassall Centre buildings, a specialist was appointed to carry out a daylight/sunlight assessment to ensure the scheme complies with the Building Research Establishment's (BRE) best practice guidance. In accordance with BRE guidance 'at least half of a garden or amenity area should receive at least 2 hours of daylight on 21st March' 3.3.17 BR 209.

The sun study plans demonstrate that the proposals do not prohibit the surrounding gardens from receiving at least 2 hours of direct sunlight on 21st March.

BRE guidance states that if the angle to the horizontal between the centre line of the lowest window and the proposed development is less than 25 degrees then the new development is 'unlikely to have a substantial effect on the diffuse skylight enjoyed by the existing building' 2.2.5 BR 209. All neighbour dwellings to the North, West and East of the site clear the 25 degree angle.

Given the layout of the plot of land and surrounding townscape, and the subsequent design, massing and form of the proposed dwelling, it is considered that no unacceptable amenity issues will arise. It is not considered that the proposal would not result in an overbearing impact or loss of light that would be detrimental to neighbour amenity.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

iii) NOISE AND ENVIRONMENTAL IMPACT

Environmental Protection have no objection to the application but do have some concerns with the potential for harm to be caused to nearby residents from demolition and construction works at the development. Concerns have been raised of asbestos presence within the existing buildings.

Noise and Environmental impacts associated with construction can be controlled through a Construction Management Plan and other conditions which have been added.

H) IS THE DEVELOPMENT ACCEPTABLE ON HIGHWAY GROUNDS?

Section 4 of the NPPF outlines that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.

Policy DM23 (Transport Development Management) of the SADMP outlines that new development should not give rise to unacceptable traffic conditions and will be expected to provide safe access to the highway network. The policy also outlines that new development should be accessible by sustainable transport methods such as walking, cycling and public transport. Furthermore, the policy sets standards for parking provision.

i) TRANSPORT STATEMENT

The applicant has confirmed that residents at the HFOP buildings will live independently and likely be over 75 years old, having relatively little for day-to-day care. 1x permanent member of staff will assist residents during working hours and 1-2x healthcare or support workers will visit the site per week. Trips resulting from the HFOP are therefore likely to be low and car ownership minimal due to the availability of public transport and improved active travel connections to local amenities, including Fishponds Road.

Furthermore, TDM has accepted that the proposed café is unlikely to generate significant additional trips to the site due to its small size and ancillary nature.

ii) TRAVEL PLAN

The applicant's Framework Travel Plan dated July 2022 is acceptable, subject to securing by condition a revised plan in BCC's template (see Guidance) and further details relating to an indicative budget, a fully costed action plan, and a car club. As stated further below, the S106 contribution to be made by the applicant in respect of the Phase 1 Travel Plan will be £3,832.

The revised travel plan should contain details of a car club scheme including:

- the allocation of X car club space(s);
- the provision of X vehicle(s);
- the provision of car club membership for all eligible residents of the development for a minimum of three years;
- promotion of the scheme; and
- the phasing of the scheme's introduction.

It has been agreed that a separate Travel Plan for the Phase 2 site will be submitted for approval upon future application. A separate fee will apply.

**Development Control Committee A – 26 April 2023**  
**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

iii) PARKING

In response to TDM's previous comments, the applicant has made the following observations:

- i. It would not be efficient to allocate parking spaces for nursery parents on site given that they are only on site for a very short time and outside of drop-off/collection times the spaces would be redundant. Disabled users would be able to drive on site to drop-off/collect children and use one of the disabled bays.
- ii. The 2 or 3 spaces out of the 6 for the HfOP not used by staff would likely be used by HfOP visitors but could also be used flexibly by visitors to the other uses on site.
- iii. The 2 spaces for the supported housing would also be for visitors to residents which could include occasional specialists attending to particular resident needs.
- iv. As confirmed in the Transport Statement with events held in the Community Space most likely to be in the evenings and weekends the Hub parking would not be occupied outside of normal working hours and therefore would be available for use by visitors attending an event.

In relation to point 'ii' above, the HFOP will benefit from an additional 2x/3x spaces, bringing the total number of HFOP visitor spaces to approximately 8x. In relation to point 'iv', TDM notes that the 5x previously proposed parking spaces at the Gateway building have been replaced by 3x disabled spaces for use by, among others, those dropping off to the Nursery. The total number of spaces at the site will thus be reduced to 49x.

TDM considers that, due to the number of apparently available parking spaces on surrounding streets, evidenced by the applicant's parking survey, and the proposed highway works and internal site measures to encourage pedestrian, cycle, and public transport movements to the site, there is unlikely to be a significant impact on highway safety as a result of the proposed parking arrangements. In summary, TDM have no objection to the level of parking.

iv) ACCESS AND LAYOUT

The proposed site layout for Phase 1 shown within the red line boundary in the landscape GA plan (drawing no. RF-108-001.H), site plan (no. 02104.P06), and ground floor plan (02105.P06) is acceptable. The results of the Stage 1 RSA commissioned by the applicant have not raised any significant concerns. The Phase 2 site layout will be the subject of a future planning application and is not yet agreed.

The applicant has confirmed by email that the proposed North car park will be accessed by automatic gates that swing inwards.

The highway works shown in drawing no. 3453.02A are listed below and agreed, subject to detailed design at S278 stage:

- Redundant vehicle crossovers reinstated to full height;
- At-grade continuous footway vehicle crossovers at all vehicle entrances to the site;
- Footway at Vassall Road to be widened to 2m and additional land adopted;
- Resurfaced footways (shown shaded) adjoining the site;
- Kerb build-outs along Gill Avenue and at the junction with Vassall Road;
- A raised table and informal crossing over Gill Avenue;
- Repainted and realigned road markings along Vassall Road and Gill Avenue;
- Upgraded street lighting in the vicinity of the site; and
- Accessibility improvements at existing and new informal crossing points at Vassall Road, Sherston Close and Symington Road.

Visibility splays shown in the highway works drawing referred to above and vehicle swept path analysis shown in drawing nos. 3453.T07 and 3453.T08 in addition to that shown in Appendix 8.1 of the Transport Statement are acceptable.

To undertake these works, the applicant is required to enter into a Section 278 agreement with the Council and pay the appropriate fee.

The proposal is not proposed to result in a detrimental impact to the parking of the adjacent roads or result in a detrimental impact to Highway Safety.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

## v) CYCLE PARKING

The applicant has provided a plan (drawing no. 02140.P01) showing the proposed cycle and refuse storage areas at the site, including the situation of cargo-bike storage at the site. The applicant has also confirmed by email that e-bike charging facilities will be provided within the internal cycle stores.

TDM are happy that the development provides sufficient cycle storage provision and this has been conditioned.

## vi) REFUSE

Policy DM32 (Recycling & Refuse Provision in New Development) of the SADMP outlines that all new development should provide bin and recycling storage facilities fit for the nature of development, with adequate capacity for the proposed development, in a location which is safe and accessible for all users and does not harm the visual amenity of the area or neighbouring amenity.

The proposals are largely acceptable, save for the doors of the Hub's bin store, which open over the footway. A revised drawing showing doors that slide or swing inwards and the removal of guard posts on the footway should be secured by condition.

The refuse store proposed is suitable and accessible, the collection point a suitable distance from the highway and has been conditioned.

## vii) S106

The applicant must make under a S106 Agreement with the Council a contribution in the sum of £9,899, comprising of a Management and Audit fee in the sum of £3,832 for the Phase 1 Travel Plan, and a TRO fee of £6,067.

## viii) ADOPTION

TDM confirms that, subject to revision of the Phase 2 site layout and the below, the Council does not object to the principle of adopting the central roadway leading from Gill Avenue and those serving the residential development at Phase 2. We will not adopt the North car park. However, TDM has agreed with the applicant that, because the character and use of the central roadway will be highly influenced by the design and layout of Phase 2, the Council will not adopt as part of this application any of the site (save for the widened footway at Vassall Road), with a view to adopting the internal site roadways once the final layout of Phase 2 is known. Adoption will be subject to agreement upon further application of required layout changes, maintenance contributions and other matters.

A dedication clause within a S278 agreement will dedicate the widened section of footway.

## I) SUSTAINABILITY

Themes of sustainability, carbon reduction and climate change underpin national planning policy. Policies BCS13-15 of the Core Strategy relates to the Councils expectations with regard to sustainable construction of new buildings and emissions in respect of climate change. These policies must be addressed and the guidance within the Council's Climate Change and Sustainability Practice Note followed. New dwellings are expected to minimise energy requirements. This will be achieved by high standards of energy efficiency including optimal levels of thermal insulation, passive ventilation and cooling, passive solar design, and the efficient use of natural resources in new buildings. Core Strategy Policy requires new dwellings are also incorporate an element of renewable energy to reduce carbon emissions by a further 20% above energy saving measures.

A sustainability statement and energy table have been submitted accompanying the application including a range of proposed energy efficiency measures and further on site renewable energy generation measures. Suggested on site renewable energy measures include air to water heat

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

pumps, gas peaking boilers, and air to air heat pumps and P.V Panels which is welcomed. Sustainable cities accept the targets can be met and have requested that further details of the proposed renewable energy sources are conditioned prior to occupation.

Following the overheating assessment measures have been included to ensure that the proposal can deal with adaptations of a changing climate.

An Electric Vehicle Point Charging Plan has been conditioned prior to commencement to ensure that the development meets sustainability requirements to limit increases in air pollution.

The proposed development is therefore considered acceptable and would make a positive contribution towards reducing energy consumption and carbon emissions.

**J) DRAINAGE**

The site is not located within an area at high risk of surface water flooding. When infiltrating SuDS techniques are proposed for a development, if potential contamination concerns are identified on site, it will need to be demonstrated that this can be managed appropriately if infiltrating SuDS are pursued, otherwise an alternative drainage option would be required. A sustainable drainage strategy has been conditioned prior to commencement.

**K) CRIME PREVENTION**

A concern was raised with lighting and natural surveillance to the site, however this has been improved to the site particularly within the public open space.

The proposal has taken on board the comments from the Crime Prevention officer where possible and a full lighting plan has been conditioned which can help address these issues.

**L) OTHER ISSUES****i) Neutrality**

Concerns have been raised that Bristol City Council's decision on the application is not neutral on the application as they are involved in renting some of the units. However, the site is owned by Bristol Charities and any potential BCC link to the site is not relevant to this application. The recommendation has been made considering relevant National and Local Planning Policies and relevant material planning considerations.

Concerns that the details on the person dealing with application at BCC have been redacted. The consultation on the application has been undertaken by the Local Planning Authority following proper procedures.

**ii) Consultation**

Concerns that consultees have been missed. All statutory consultees have been consulted and consultation on the application has been undertaken by the Local Planning Authority following proper procedures.

**iii) Impact on water pressure will be covered through other legislation and is not a material planning consideration.**

No other issues.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

## EQUALITY ASSESSMENT

During the determination of this application due regard has been given to the impact of this scheme in relation to the Equality Act 2010 in terms of its impact upon key equalities protected characteristics. These characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. There is no indication or evidence (including from consultation with relevant groups) that different groups have or would have different needs, experiences, issues and priorities in relation this particular proposed development. The proposed development will provide C2 Specialist and Elderly Care units that are identified as needed in the area and provide a means of offering support to the wider community. The proposal provides an opportunity to retain and improve on the services provided at the Vassall Centre to better serve the local community having positive implications on wider community groups providing an inclusive development.

Overall, it is considered that this application would not have any significant adverse impact upon different groups or implications for the Equality Act 2010.

## CONCLUSION

The redevelopment of the Vassall Centre site provides an opportunity to retain and improve on the services provided at the Vassall Centre to better serve the local community. The proposal is considered to comply with Policy DM5 iii as the community facility can be fully reinstated as part of any redevelopment of the land and is therefore considered acceptable.

The proposed design is considered inkeeping and the proposal meets sustainability targets.

The proposed development will provide C2 Specialist and Elderly Care units that are identified as needed in the area and provide a means of offering support to the wider community.

The proposed positive aspects of the proposal far outweigh any negatives and it is recommended that permission be granted to the proposed development in this case.

The application is recommended for Approval subject to conditions following an S106 regarding Highway Contributions and Fire Hydrants

## RECOMMENDED -GRANT subject to Planning Agreement

That the applicant be advised that the Local Planning Authority is disposed to grant planning permission, subject to the completion, within a period of six months from the date of this committee, or any other time as may be reasonably agreed with the Service Director, Planning and Sustainable Development and at the applicant's expense, of a planning agreement made under the terms of Section 106 of the Town and Country Planning Act 1990 (as amended), entered into by the applicant to cover the following matters:

- i. A financial contribution of £5,395 for the making of the Transport Regulation Order
- ii. Fire hydrant £3,000 plus vat.

B. That the Head of Legal Services be authorised to conclude the Planning Agreement to cover matters in recommendation (A).

C. That on completion of the Section 106 Agreement, planning permission be granted, subject to the following conditions:

The following development types will be liable for CIL:

- i. Development comprising 100m<sup>2</sup> or more of new build floorspace
- ii. Development of less than 100m<sup>2</sup> of new build floorspace that results in the creation of one or more dwellings
- iii. The conversion of a building that is no longer in lawful use

In this case, the proposed development would comprise of new build residential floor space creating a new dwelling. The development is therefore CIL liable to the £52806.33

**Development Control Committee A – 26 April 2023**  
**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

**RECOMMENDED** GRANT subject to Planning Agreement

**Time limit for commencement of development**

1. Full Planning Permission

The development hereby permitted shall begin before the expiration of three years from the date of this permission.

Reason: As required by Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

Pre commencement condition(s)

2. A site specific risk assessment and intrusive investigation shall be carried out to assess the nature and extent of any site contamination and whether or not it originates from the site. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The results of this investigation shall be considered along with the reports submitted with the original application. The written report of the findings shall be submitted to an approved in writing by the Local Planning Authority prior to any works in connection with the development, hereby approved, commencing on site. This must be conducted in accordance with the Environment Agency's Land Contamination: risk management and BS10175:2011 + A2:2017: Investigation of Potentially Contaminated Sites - Code of Practice.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. This is in line with paragraph 170 of the National Planning Policy Framework.

3. No development shall take place until a site specific Construction Management Plan has been submitted to and approved in writing by the Council. The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting.

The Construction Environmental Management Plan should also include but is not limited to reference to the following:

All works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the Local Planning Authority, shall be carried out only between the following hours: 08 00 Hours and 18 00 Hours on Mondays to Fridays and 08 00 and 13 00 Hours on Saturdays and at no time on Sundays and Bank Holidays.

Mitigation measures as defined in BS 5528: Parts 1 and 2 : 2009 Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise disturbance from construction works.

Procedures for emergency deviation of the agreed working hours.

Control measures for dust and other air-borne pollutants.

Measures for controlling the use of site lighting whether required for safe working or for security purposes.

Procedures for maintaining good public relations including complaint management, public

**Development Control Committee A – 26 April 2023**  
**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

consultation and liaison.

- A construction programme including phasing of works;
- 24 hour emergency contact number;
- Hours of operation;
- Expected number and type of vehicles accessing the site:
- Deliveries, waste, cranes, equipment, plant, works, visitors;
  - o Size of construction vehicles;
  - o The use of a consolidation operation or scheme for the delivery of materials and goods;
  - o Phasing of works;
- Means by which a reduction in the number of movements and parking on nearby streets can be achieved (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction):
  - o Programming;
  - o Waste management;
  - o Construction methodology;
  - o Shared deliveries;
  - o Car sharing;
  - o Travel planning;
  - o Local workforce;
  - o Parking facilities for staff and visitors;
  - o On-site facilities;
  - o A scheme to encourage the use of public transport and cycling; and
- Routes for construction traffic, avoiding weight and size restrictions to reduce unsuitable traffic on residential roads;
- Locations for loading/unloading, waiting/holding areas and means of communication for delivery vehicles if space is unavailable within or near the site;
- Locations for storage of plant/waste/construction materials;
- Arrangements for the turning of vehicles, to be within the site unless completely unavoidable;
- Arrangements to receive abnormal loads or unusually large vehicles;
- Swept paths showing access for the largest vehicles regularly accessing the site and measures to ensure adequate space is available;
- Any necessary temporary traffic management measures;
- Measures to protect vulnerable road users (cyclists and pedestrians);
- Arrangements for temporary facilities for any bus stops or routes;
- Method of preventing mud being carried onto the highway; and
- Methods of communicating the Construction Management Plan to staff, visitors and neighbouring residents and businesses.

Reason In the interests of residential amenity.

4. No development shall take place until a detailed design, management and maintenance plan of surface water drainage for the site using SuDS methods in line with the submitted Drainage Strategy has been submitted to and approved in writing by the Local Planning Authority. The approved drainage system shall be implemented in accordance with the approved Sustainable Drainage Strategy prior to the use of the building commencing and maintained thereafter for the lifetime of the development.

Reason: To prevent the increased risk of flooding by ensuring the provision of a satisfactory means of surface water disposal is incorporated into the design and the build and that the principles of sustainable drainage are incorporated into this proposal and maintained for the lifetime of the proposal.

5. Prior to the installation of external lighting details of the proposed external lighting shall be submitted to and agreed in writing by the Local Planning Authority. This shall include a lux level contour plan (showing lux levels at frequent intervals and extend outwards to additional



**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

levels (above the pre-existing background light level) of zero lux) and should seek to ensure no light spill outside the site boundaries. The lux contour levels should be superimposed on a site plan which includes all land that is affected by raised light levels (including land outside the red line planning application area where necessary).

Reason: To conserve legally protected bats and other nocturnal wildlife and to protect the amenity of occupants of nearby residential properties.

6. B1B Approval of road works necessary

No development shall take place until general arrangement plan(s) to a scale of 1:200 showing the following works to the adopted highway has been submitted to and approved in writing by the Local Planning Authority.

Where applicable indicating proposals for:

- Reinstated redundant vehicle crossovers to full height;
- At-grade continuous footway vehicle crossovers at all vehicle entrances to the site;
- Footway to be adopted at Vassall Road widened to a width of 2m;
- Resurfaced footways (shown shaded) adjoining the site;
- Kerb build-outs along Gill Avenue and at the junction with Vassall Road;
- A raised table and informal crossing over Gill Avenue;
- Repainted and realigned road markings along Vassall Road and Gill Avenue;
- Upgraded street lighting in the vicinity of the site;
- Any required alterations to existing drainage;
- Accessibility improvements at existing and new informal crossing points at Vassall Road, Sherston Close and Symington Road; and
- Existing levels of the finished highway tying into building threshold levels;
- Alterations to waiting restrictions or other Traffic Regulation Orders to enable the works;
- Signing, street furniture, street trees and pits;
- Structures on or adjacent to the highway; and
- Extent of any stopping up, diversion or dedication of new highway (including all public rights of way shown on the definitive map and statement).

No development shall take place over the route of any public right of way prior to the confirmation of a Town & Country Planning Act 1990 path diversion/stopping up order.

Prior to occupation these works shall be completed to the satisfaction of the Highway Authority and approved in writing by the Local Planning Authority.

Reason: In the interests of public safety and to ensure that all road works associated with the proposed development are: planned; approved in good time (including any statutory processes); undertaken to a standard approved by the Local Planning Authority; and completed before occupation.

7. Approval of road works necessary

No development shall take place until general arrangement plan(s) to a scale of 1:200 showing the following works to the adopted highway has been submitted to and approved in writing by the Local Planning Authority.

Where applicable indicating proposals for:

- Reinstated redundant vehicle crossovers to full height;
- At-grade continuous footway vehicle crossovers at all vehicle entrances to the site;
- Footway to be adopted at Vassall Road widened to a width of 2m;
- Resurfaced footways (shown shaded) adjoining the site;
- Kerb build-outs along Gill Avenue and at the junction with Vassall Road;
- A raised table and informal crossing over Gill Avenue;
- Repainted and realigned road markings along Vassall Road and Gill Avenue;
- Upgraded street lighting in the vicinity of the site;

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

- Any required alterations to existing drainage;
- Accessibility improvements at existing and new informal crossing points at Vassall Road, Sherston Close and Symington Road; and
- Existing levels of the finished highway tying into building threshold levels;
- Alterations to waiting restrictions or other Traffic Regulation Orders to enable the works;
- Signing, street furniture, street trees and pits;
- Structures on or adjacent to the highway; and
- Extent of any stopping up, diversion or dedication of new highway (including all public rights of way shown on the definitive map and statement).

No development shall take place over the route of any public right of way prior to the confirmation of a Town & Country Planning Act 1990 path diversion/stopping up order.

Prior to occupation these works shall be completed to the satisfaction of the Highway Authority and approved in writing by the Local Planning Authority.

Reason: In the interests of public safety and to ensure that all road works associated with the proposed development are: planned; approved in good time (including any statutory processes); undertaken to a standard approved by the Local Planning Authority; and completed before occupation.

8. No development shall take place until (a) detailed part elevation(s) and section(s) at 1:20 scale showing all typical external treatments and building elements such as the windows boxing, soffits and fascias; and interface between the different materials. This must be submitted and approved in writing by the Local Planning Authority. The development will be carried out in accordance with the approved details.

REASON: in order to ensure that the external appearance of the building(s) is/are satisfactory, in accordance with quality expectations set out within the approved plans, and appropriate to the local context.

9. Highway to be adopted

No development shall take place until plans to a scale of 1:200 showing the following information have been submitted to and approved in writing by the Local Planning Authority.

- Long sections;
- General arrangement plan showing the area of footway to be adopted;
- Threshold levels to buildings;
- Drainage; and
- Structures.

Prior to occupation detailed technical plans to a scale of 1:200 setting out how the widened footway will be constructed to the Highway Authority's adoptable standard shall be submitted and approved in writing by the Local Planning Authority.

These works shall then be completed to the satisfaction of the Highway Authority and approved in writing by the Local Planning Authority

Reason: To ensure the internal roads are planned and approved in good time to a satisfactory standard for use by the public and are completed prior to occupation.

10. Sample panels of all external materials including wall facing materials, external cladding, plinth, external doors and windows including frames, sills, lintels and surrounds, door/window, decorative features, eaves, rainwater goods demonstrating the colour, texture, face bond and pointing shall be erected at an appropriate location on site and approved in writing by the Local Planning Authority before the relevant parts of the works are commenced. The development shall be completed in accordance with the approved reference panel before the building is occupied. The approved reference panel should be retained until the completion of the building.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

Reason: In order to ensure the quality of the design and external appearance of the building is of high quality and compliant with the local Plan.

11. No development shall take place until (a) detailed part elevation(s) and section(s) at 1:20 scale showing all typical external treatments and building elements such as the windows boxing, soffits and fascias; and interface between the different materials. This should include any detailed designs of the proposed pedestrian entrance structure. This must be submitted and approved in writing by the Local Planning Authority. The development will be carried out in accordance with the approved details.

Reason: in order to ensure that the external appearance of the building(s) is/are satisfactory, in accordance with quality expectations set out within the approved plans, and appropriate to the local context (specify setting of historic asset if relevant).

12. Sample panels of all external materials including wall facing materials, external cladding, plinth, external doors and windows including frames, sills, lintels and surrounds, door/window, decorative features, eaves, rainwater goods demonstrating the colour, texture, face bond and pointing shall be erected at an appropriate location on site and approved in writing by the Local Planning Authority before the relevant parts of the works are commenced. The development shall be completed in accordance with the approved reference panel before the building is occupied. The approved reference panel should be retained until the completion of the building.

Reason: In order to ensure the quality of the design and external appearance of the building is of high quality and compliant with the local Plan.

13. Notwithstanding the approved plans detailed design for hard and soft landscape works should be submitted and agreed with the Local Planning Authority prior to the commencement of development. These works should be delivered in accordance with the agreed plan and phasing which is linked to the occupation of the building of the relevant phase.

Reason: To ensure that the appearance of the proposed landscaping is acceptable and phased appropriately.

14. Highway Condition Survey

No development shall take place (including investigation work, demolition, siting of site compound/welfare facilities) until a survey of the condition of the adopted highway has been submitted to and approved in writing by the Local Planning Authority. The extent of the area to be surveyed must be agreed by the Highways Authority prior to the survey being undertaken. The survey must consist of:

- o A plan to a scale of 1:1000 showing the location of all defects identified;
- o A written and photographic record of all defects with corresponding location references accompanied by a description of the extent of the assessed area and a record of the date, time and weather conditions at the time of the survey.

No building or use hereby permitted shall be occupied or the use commenced until any damage to the adopted highway has been made good to the satisfaction of the Highway Authority.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

Reason: To ensure that any damage to the adopted highway sustained throughout the development process can be identified and subsequently remedied at the expense of the developer.

## 15. Landscape Details

Detailed drawings including plans, sections and elevations at a relevant scale between 1:5 and 1:20 of the following shall be submitted to and be approved in writing by the Local Planning Authority before the relevant part of work is begun. The works shall be carried out in accordance with that approval.

- o Full details of tree pit construction in hard and soft landscape areas showing relationship to the surrounding highway and footway paving where applicable, tree grills where used, nature of growing medium, size of pits, tree support, method of anchoring and means of irrigation to ensure the provision of optimum growing conditions for newly planted trees.
- o Construction details for junctions between i) paving materials (showing changes of level ) and ii) between areas of hard and soft landscape treatments.
- o Construction details of boundary treatments, retaining walls
- o Details of any furniture including seating, lamps, and proposed boundary signage.

Reason: To ensure that the appearance of the proposed landscaping is acceptable.

16. Prior to the installation of external lighting details of the proposed external lighting shall be submitted to and agreed in writing by the Local Planning Authority. This shall include a lux level contour plan (showing lux levels at frequent intervals and extend outwards to additional levels (above the pre-existing background light level) of zero lux) and should seek to ensure no light spill outside the site boundaries. The lux contour levels should be superimposed on a site plan which includes all land that is affected by raised light levels (including land outside the red line planning application area where necessary).

Reason: To conserve legally protected bats and other nocturnal wildlife and to protect the amenity of occupants of nearby residential properties.

## 17. Travel Plan To be amended

No development shall take place, including any demolition works, until a revised Framework Travel Plan in BCC's template containing further details relating to an indicative budget, a fully costed action plan, and a car club has been prepared, submitted to and approved in writing by the Local Planning Authority. The approved Travel Plan shall be implemented, monitored and reviewed in accordance with the agreed Travel Plan Targets to the satisfaction of the Council.

Reason: To support sustainable transport objectives including a reduction in single occupancy car journeys and the increased use of public transport, walking & cycling.

## 18. Highway to be adopted

No development shall take place until plans to a scale of 1:200 showing the following information have been submitted to and approved in writing by the Local Planning Authority.

- Long sections;
- General arrangement plan showing the area of footway to be adopted;
- Threshold levels to buildings;
- Drainage; and
- Structures.

Prior to occupation detailed technical plans to a scale of 1:200 setting out how the widened footway will be constructed to the Highway Authority's adoptable standard shall be submitted and approved in writing by the Local Planning Authority.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

These works shall then be completed to the satisfaction of the Highway Authority and approved in writing by the Local Planning Authority.

Reason: To ensure the internal roads are planned and approved in good time to a satisfactory standard for use by the public and are completed prior to occupation.

## 19. Travel Plan To be amended

No development shall take place, including any demolition works, until a revised Framework Travel Plan in BCC's template containing further details relating to an indicative budget, a fully costed action plan, and a car club has been prepared, submitted to and approved in writing by the Local Planning Authority. The approved Travel Plan shall be implemented, monitored and reviewed in accordance with the agreed Travel Plan Targets to the satisfaction of the Council.

Reason: To support sustainable transport objectives including a reduction in single occupancy car journeys and the increased use of public transport, walking & cycling.

## 20. Highway Condition Survey

No development shall take place (including investigation work, demolition, siting of site compound/welfare facilities) until a survey of the condition of the adopted highway has been submitted to and approved in writing by the Local Planning Authority. The extent of the area to be surveyed must be agreed by the Highways Authority prior to the survey being undertaken. The survey must consist of:

- o A plan to a scale of 1:1000 showing the location of all defects identified;
- o A written and photographic record of all defects with corresponding location references accompanied by a description of the extent of the assessed area and a record of the date, time and weather conditions at the time of the survey.

No building or use hereby permitted shall be occupied or the use commenced until any damage to the adopted highway has been made good to the satisfaction of the Highway Authority.

Reason: To ensure that any damage to the adopted highway sustained throughout the development process can be identified and subsequently remedied at the expense of the developer.

## 21. Landscape Details

Detailed drawings including plans, sections and elevations at a relevant scale between 1:5 and 1:20 of the following shall be submitted to and be approved in writing by the Local Planning Authority before the relevant part of work is begun. The works shall be carried out in accordance with that approval.

- o Full details of tree pit construction in hard and soft landscape areas showing relationship to the surrounding highway and footway paving where applicable, tree grills where used, nature of growing medium, size of pits, tree support, method of anchoring and means of irrigation to ensure the provision of optimum growing conditions for newly planted trees.
- o Construction details for junctions between i) paving materials (showing changes of level ) and ii) between areas of hard and soft landscape treatments.
- o Construction details of boundary treatments, retaining walls
- o Details of any furniture including seating, lamps, and proposed boundary signage.

Reason: To ensure that the appearance of the proposed landscaping is acceptable.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

22. Notwithstanding the approved plans detailed design for hard and soft landscape works should be submitted and agreed with the Local Planning Authority prior to the commencement of development.

These works should be delivered in accordance with the agreed plan and phasing which is linked to the occupation of the building of the relevant phase.

Reason: To ensure that the appearance of the proposed landscaping is acceptable and phased appropriately.

23. Maintenance Plan

A detailed maintenance plan to ensure establishment of the soft landscape works for the scheme over the first 5 years should be provided and agreed with the local planning authority prior to the commencement of soft landscape works.

Once agreed, the soft landscape should be maintained and managed in accordance with these plans.

Reason: To ensure that approved landscaping scheme is maintained following its implementation and ecology is preserved.

24. Prior to implementation, details of the proposed PV system including location, dimensions, design/technical specification together with calculation of annual energy generation (kWh/annum) and associated reduction in residual CO2 emissions shall be provided to the Local Planning Authority.

Reason: To ensure the development contributes to reducing CO2 emissions in accordance with policy BCS14.

Pre occupation condition(s)

25. Car Park Management Plan

No building or use hereby permitted shall be occupied or use commenced until a car park management plan setting out how the car park will be managed has been prepared, submitted to and approved in writing by the Local Planning Authority. The measures shall thereafter be implemented in accordance with the approved car park management plan for the lifetime of the development.

Reason: To ensure the safe operation of approved car park(s).

26. Further details of Refuse Storage and Recycling Facilities before occupation:

No building or use hereby permitted shall be occupied or use commenced until detailed designs of the following have been submitted to and approved in writing by the Local Planning Authority:

- Doors to the Hub bin store that slide or swing inwards and the removal of guard posts on the footway.

The detail thereby approved shall be carried out in accordance with that approval, and thereafter all refuse and recyclable materials associated with the development shall either be stored within this dedicated store/area, as shown on the approved plans, or internally within the buildings that form part of the application site. No refuse or recycling material shall be stored or placed for collection on the adopted highway (including the footway), except on the day of collection.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

Reason: To safeguard the amenity of the occupiers of adjoining premises; protect the general environment; prevent any obstruction to pedestrian movement and to ensure that there are adequate facilities for the storage and recycling of recoverable materials.

27. Prior to occupation the following information shall be provided:

- o Evidence of the PV system as installed including exact location, technical specification and projected annual energy yield (kWh/year) e.g. a copy of the MCS installer's certificate.
- o A calculation showing that the projected annual yield of the installed system is sufficient to reduce residual CO2 emissions by at least 20%.

Reason: To ensure that the development contributes to mitigating and adapting to climate change and to meeting targets to reduce carbon dioxide emissions

**Advisory note**

The projected annual yield and technical details of the installed system will be provided by the Micro-generation Certification Scheme (MCS) approved installer.

The impact of shading on the annual yield of the installed PV system (the Shading Factor) should be calculated by an MCS approved installer using the Standard Estimation Method presented in the MCS guidance.

28. Completion of Pedestrians/Cyclists Access - Shown on approved plans

No building or use hereby permitted shall be occupied or the use commenced until the means of access for pedestrians and/or cyclists have been constructed in accordance with the approved plans and shall thereafter be retained for access purposes only.

Reason: In the interests of highway safety.

29. Reporting of Unexpected Contamination

In the event that contamination is found at any time that had not previously been identified when carrying out the approved development, it must be reported immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the Environment Agency's Land Contamination: risk management guidance and BS 10175:2011 + A2:2017: Investigation of Potentially Contaminated Sites - Code of Practice. Where remediation is necessary a remediation scheme must be prepared which ensures the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Reason (for all contamination conditions): To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

30. Car Club

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

No building or use hereby permitted shall be occupied or use commenced until details of a car club scheme, in accordance with a contract to be entered into by the developer and an approved car club provider, shall be submitted to and approved in writing by the Local Planning Authority. The car club scheme shall comprise (where applicable):

- o The allocation of x car club parking space(s)
- o The provision of x vehicle(s)
- o Provision of car club membership for all eligible residents of the development for a minimum of three years
- o Promotion of the scheme
- o The phasing at which the scheme will be introduced

Reason: In order to reduce the need for excessive car ownership

## 31. Electric Vehicle Charging Points

No building or use hereby permitted shall be commenced until details of Electrical Vehicle Charging infrastructure, management plan and phasing for implementation has been submitted to and approved in writing by the Local Planning Authority. This shall include details of the following:

- Final Layout;
- Number and location of EV parking spaces;
- Number and location of EV charging points;
- Type of EV charging points (fast, rapid);
- Indicative locations for feeder pillars and protective infrastructure;
- Evidence of power supply from WPD (to ensure substation capacity is adequate);
- Indicative location of substation (where required);
- Indicative cable routing;
- Management plan outlining proposed management of spaces, charging network and infrastructure;
- Electrical Layout and Schematic Design; and
- Feeder Pillar Design/Electrical Layout/Schematic Layout Designs.

The Electric Vehicle Charging Points and management plan as approved shall be implemented prior to occupation / as per the agreed phasing plan and retained in that form thereafter for the lifetime of the development.

Reason: To promote sustainable travel, help reduce air pollution levels and mitigate climate change.

## 32. Delivery &amp; Servicing Plan

No building or use hereby permitted shall be occupied or use commenced until a delivery and servicing plan has been prepared, submitted to and approved in writing by the Local Planning Authority. The measures shall thereafter be implemented in accordance with the approved delivery and servicing plan for the lifetime of the development. The delivery and servicing plan shall include:

- a) The contact details of a suitably qualified co-ordinator;
- b) How vehicle arrivals, departures, parking, stopping and waiting will be controlled to minimise any impact on the adopted highway;
- c) Details of any freight consolidation operation, centre and the delivery and servicing booking and management systems;

Reason: In the interests of highway safety and to minimise the impact of vehicles servicing the



**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

development upon congestion

## 33. Waste Management Plan

No building or use hereby permitted shall be occupied or use commenced until a waste management plan setting out how waste will be stored and collected has been prepared, submitted to and approved in writing by the Local Planning Authority. The measures shall thereafter be implemented in accordance with the approved waste management plan for the lifetime of the development.

Reason: To ensure appropriate waste management facilities are provided to accommodate all waste generated by the development.

## 34. Car Park Management Plan

No building or use hereby permitted shall be occupied or use commenced until a car park management plan setting out how the car park will be managed has been prepared, submitted to and approved in writing by the Local Planning Authority. The measures shall thereafter be implemented in accordance with the approved car park management plan for the lifetime of the development.

Reason: To ensure the safe operation of approved car park(s).

## 35. Prior to occupation the following information shall be provided:

- o Evidence of the PV system as installed including exact location, technical specification and projected annual energy yield (kWh/year) e.g. a copy of the MCS installer's certificate.
- o A calculation showing that the projected annual yield of the installed system is sufficient to reduce residual CO2 emissions by at least 20%.

Reason: To ensure that the development contributes to mitigating and adapting to climate change and to meeting targets to reduce carbon dioxide emissions

## Advisory note

The projected annual yield and technical details of the installed system will be provided by the Micro-generation Certification Scheme (MCS) approved installer.

The impact of shading on the annual yield of the installed PV system (the Shading Factor) should be calculated by an MCS approved installer using the Standard Estimation Method presented in the MCS guidance.

## 36. In the event that contamination is found, no occupation of the development shall take place until the approved remediation scheme has been carried out in accordance with its terms. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works. Following completion of measures identified in the approved remediation scheme, a verification report (otherwise known as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced, and be approved in writing by the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. This is in line with paragraph 170 of the National Planning Policy Framework.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

37. Prior to the occupation of the development hereby approved, details of the number, siting and appearance of bird and bat boxes at the development shall be submitted for approval in writing by the Local Planning Authority. The approved details shall be implemented and be in place prior to the first occupation of the development hereby approved and shall thereafter be retained and maintained in situ'.

Reason: In the interest of nature conservation.

38. Further details of Refuse Storage and Recycling Facilities before occupation:

No building or use hereby permitted shall be occupied or use commenced until detailed designs of the following have been submitted to and approved in writing by the Local Planning Authority:

- Doors to the Hub bin store that slide or swing inwards and the removal of guard posts on the footway.

The detail thereby approved shall be carried out in accordance with that approval, and thereafter all refuse and recyclable materials associated with the development shall either be stored within this dedicated store/area, as shown on the approved plans, or internally within the buildings that form part of the application site. No refuse or recycling material shall be stored or placed for collection on the adopted highway (including the footway), except on the day of collection.

Reason: To safeguard the amenity of the occupiers of adjoining premises; protect the general environment; prevent any obstruction to pedestrian movement and to ensure that there are adequate facilities for the storage and recycling of recoverable materials.

39. Completion and Maintenance of Vehicular Servicing facilities - Shown on approved plans

No building or use hereby permitted shall be occupied or use commenced until the facilities for loading, unloading, circulation and manoeuvring have been completed in accordance with the approved plans. Thereafter, these areas shall be kept free of obstruction and available for these uses.

Reason: To ensure that there are adequate servicing facilities within the site in the interests of highway safety.

40. Completion and Maintenance of Car/Vehicle Parking - Shown on Approved Plans

No building or use hereby permitted shall be occupied or use commenced until the car/vehicle parking area (and turning space) shown on the approved plans has been completed and thereafter the area shall be kept free of obstruction and available for the parking of vehicles associated with the development. Driveways/vehicle parking areas accessed from the adopted highway must be properly consolidated and surfaced, (not loose stone, gravel or grasscrete) and subsequently maintained in good working order at all times thereafter for the lifetime of the development.

Reason: To ensure that there are adequate parking facilities to serve the development constructed to an acceptable standard.

41. Completion and Maintenance of Cycle Provision - Shown on approved plans

No building or use hereby permitted shall be occupied or the use commenced until the cycle parking provision shown on the approved plans has been completed, and thereafter, be kept free of obstruction and available for the parking of cycles only.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

Reason: To ensure the provision and availability of adequate cycle parking.

## 42. Completion and Maintenance of Vehicular Servicing facilities - Shown on approved plans

No building or use hereby permitted shall be occupied or use commenced until the facilities for loading, unloading, circulation and manoeuvring have been completed in accordance with the approved plans. Thereafter, these areas shall be kept free of obstruction and available for these uses.

Reason: To ensure that there are adequate servicing facilities within the site in the interests of highway safety.

## 43. Completion and Maintenance of Car/Vehicle Parking - Shown on Approved Plans

No building or use hereby permitted shall be occupied or use commenced until the car/vehicle parking area (and turning space) shown on the approved plans has been completed and thereafter the area shall be kept free of obstruction and available for the parking of vehicles associated with the development. Driveways/vehicle parking areas accessed from the adopted highway must be properly consolidated and surfaced, (not loose stone, gravel or grasscrete) and subsequently maintained in good working order at all times thereafter for the lifetime of the development.

Reason: To ensure that there are adequate parking facilities to serve the development constructed to an acceptable standard.

## 45. Management and Maintenance of Private Streets

No building or use hereby permitted shall be occupied or use commenced until details of arrangements for the future management and maintenance of proposed carriageways, footways, footpaths and landscaped areas not put forward for adoption within the site has been submitted to and approved in writing by the Local Planning Authority. Following occupation of the first dwelling on the site, the streets shall be maintained in accordance with the approved management and maintenance details.

Reason: To ensure that all private streets and landscaped areas are appropriately managed and maintained to ensure the safety of all users.

## 46. Completion of Vehicular Access - Shown on Approved Plans

No building or use hereby permitted shall be occupied or use commenced until the means of vehicular access has been constructed and completed in accordance with the approved plans and the said means of vehicular access shall thereafter be retained for access purposes only for the lifetime of the development. Any access point opening onto the adopted highway shall include suitable drainage provision within the curtilage of the site, to prevent the discharge of any surface water onto the adopted highway.

Reason: To ensure that the vehicular access point is safe and includes adequate drainage.

## 47. Completion of Pedestrians/Cyclists Access - Shown on approved plans

No building or use hereby permitted shall be occupied or the use commenced until the means of access for pedestrians and/or cyclists have been constructed in accordance with the approved plans and shall thereafter be retained for access purposes only.

Reason: In the interests of highway safety.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

## 48. Completion of Vehicular Access - Shown on Approved Plans

No building or use hereby permitted shall be occupied or use commenced until the means of vehicular access has been constructed and completed in accordance with the approved plans and the said means of vehicular access shall thereafter be retained for access purposes only for the lifetime of the development. Any access point opening onto the adopted highway shall include suitable drainage provision within the curtilage of the site, to prevent the discharge of any surface water onto the adopted highway.

Reason: To ensure that the vehicular access point is safe and includes adequate drainage.

## 49. Car Club

No building or use hereby permitted shall be occupied or use commenced until details of a car club scheme, in accordance with a contract to be entered into by the developer and an approved car club provider, shall be submitted to and approved in writing by the Local Planning Authority. The car club scheme shall comprise (where applicable):

- o The allocation of x car club parking space(s)
- o The provision of x vehicle(s)
- o Provision of car club membership for all eligible residents of the development for a minimum of three years
- o Promotion of the scheme
- o The phasing at which the scheme will be introduced

Reason: In order to reduce the need for excessive car ownership

## 50. Completion and Maintenance of Cycle Provision - Shown on approved plans

No building or use hereby permitted shall be occupied or the use commenced until the cycle parking provision shown on the approved plans has been completed, and thereafter, be kept free of obstruction and available for the parking of cycles only.

Reason: To ensure the provision and availability of adequate cycle parking.

## 51. Management and Maintenance of Private Streets

No building or use hereby permitted shall be occupied or use commenced until details of arrangements for the future management and maintenance of proposed carriageways, footways, footpaths and landscaped areas not put forward for adoption within the site has been submitted to and approved in writing by the Local Planning Authority. Following occupation of the first dwelling on the site, the streets shall be maintained in accordance with the approved management and maintenance details.

Reason: To ensure that all private streets and landscaped areas are appropriately managed and maintained to ensure the safety of all users.

## 52. Electric Vehicle Charging Points

No building or use hereby permitted shall be commenced until details of Electrical Vehicle Charging infrastructure, management plan and phasing for implementation has been submitted to and approved in writing by the Local Planning Authority. This shall include details of the following:

- Final Layout;

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

- Number and location of EV parking spaces;
- Number and location of EV charging points;
- Type of EV charging points (fast, rapid);
- Indicative locations for feeder pillars and protective infrastructure;
- Evidence of power supply from WPD (to ensure substation capacity is adequate);
- Indicative location of substation (where required);
- Indicative cable routing;
- Management plan outlining proposed management of spaces, charging network and infrastructure;
- Electrical Layout and Schematic Design; and
- Feeder Pillar Design/Electrical Layout/Schematic Layout Designs.

The Electric Vehicle Charging Points and management plan as approved shall be implemented prior to occupation / as per the agreed phasing plan and retained in that form thereafter for the lifetime of the development.

Reason: To promote sustainable travel, help reduce air pollution levels and mitigate climate change.

## 53. Delivery &amp; Servicing Plan

No building or use hereby permitted shall be occupied or use commenced until a delivery and servicing plan has been prepared, submitted to and approved in writing by the Local Planning Authority. The measures shall thereafter be implemented in accordance with the approved delivery and servicing plan for the lifetime of the development. The delivery and servicing plan shall include:

- a) The contact details of a suitably qualified co-ordinator;
- b) How vehicle arrivals, departures, parking, stopping and waiting will be controlled to minimise any impact on the adopted highway;
- c) Details of any freight consolidation operation, centre and the delivery and servicing booking and management systems;

Reason: In the interests of highway safety and to minimise the impact of vehicles servicing the development upon congestion

## 54. Waste Management Plan

No building or use hereby permitted shall be occupied or use commenced until a waste management plan setting out how waste will be stored and collected has been prepared, submitted to and approved in writing by the Local Planning Authority. The measures shall thereafter be implemented in accordance with the approved waste management plan for the lifetime of the development.

Reason: To ensure appropriate waste management facilities are provided to accommodate all waste generated by the development.

## Post occupation management

## 55. Unexploded Ordnance Risk Assessment Compliance Condition

The development hereby approved must be implemented in accordance with the mitigation measures outlined in the Detailed Unexploded Ordnance Threat and Risk Assessment, prepared by Alpha Associates, dated 05/05/2022.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

Reason: To ensure that development can take place without unacceptable risk to workers and neighbours including any unacceptable major disruption to the wider public on and off site that may arise as a result of evacuation/s associated with the mitigation of UXO

## 56. Deliveries (commercial uses only)

Activities relating to deliveries shall only take place between 08.00 and 20.00 Monday to Saturday and not at all on Sundays or Bank Holidays.

Reason: In the interests of neighbour amenity.

## 57. Use of Refuse and Recycling facilities (commercial uses only)

Activities relating to the collection of refuse and recyclables and the tipping of empty bottles into external receptacles shall only take place between 08.00 and 20.00 Monday to Saturday and not at all on Sundays or Bank Holidays.

Reason: In the interests of neighbour amenity.

## 58. No equipment for the extraction and dispersal of cooking smells/fumes shall be installed until details including method of construction, odour control measures, noise levels, appearance and ongoing maintenance have been submitted to and been approved in writing by the Local Planning

Authority. The approved scheme shall be installed before the installation of any such equipment and thereafter shall be permanently retained

Reason In the interests of neighbour amenity.

## 59. Noise from plant &amp; equipment affecting residential

The rating level of any noise generated by plant & equipment as part of the development shall be at least 5 dB below the pre-existing background level as determined by BS 4142:2014+A1:2019

Methods for rating and assessing industrial and commercial sound.

Prior to the commencement of the use of this development an assessment to show that the rating level of any external plant & equipment will be at least 5 dB below the background level has been

submitted to and approved in writing by the Council.

The assessment must be carried out by a suitably qualified acoustic consultant/engineer and be in accordance with BS4142: 2014 Methods for rating and assessing industrial and commercial sound.

Reason In the interests of neighbour amenity.

## 60. Hours of operation of commercial uses.

The opening hours of the commercial uses shall not be carried out outside the hours of 08.00 to 23.00 Monday to Saturday and on Sunday 09.00 to 17.00. Unless otherwise agreed in writing with the Local Planning Authority.

Reason: To safeguard the residential amenity of nearby occupiers.

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

## List of approved plans

## 61. List of approved plans and drawings

The development shall conform in all aspects with the plans and details shown in the application as listed below, unless variations are agreed by the Local Planning Authority in order to discharge other conditions attached to this decision.

4469-AWW-ZZ-00-DR-A-02105-P08 , received 23 February 2023  
 4469-AWW-ZZ-00-DR-A-02105-P08 , received 23 February 2023  
 4469-AWW-02-00-DR-A-02220-P06 , received 23 February 2023  
 4469-AWW-ZZ-ZZ-DR-A-02104-P08 , received 23 March 2023  
 4469-AWW-02-02-DR-A-02222-P05 Second floor plan, received 26 July 2022  
 Location plan, received 26 July 2022  
 4469-AWW-02-00-DR-A-02220-P05 Ground floor plan, received 26 July 2022  
 4469-AWW-02-01-DR-A-02221-P05 First floor plan, received 26 July 2022  
 4469-AWW-02-RF-DR-A-02223-P03 Roof plan, received 26 July 2022  
 4469-AWW-02-ZZ-DR-A-02224-P02 Typical apartments layout, received 26 July 2022  
 4469-AWW-02-ZZ-DR-A-02230-P02 Elevation Vassall Road and Gill Avenue, received 26 July 2022  
 4469-AWW-03-01-DR-A-02321-P05 Hub first floor plan, received 26 July 2022  
 4469-AWW-02-ZZ-DR-A-02231-P02 Entrance and elevation, received 26 July 2022  
 4469-AWW-02-ZZ-DR-A-02232-P02 Elevation courtyard North East, received 26 July 2022  
 4469-AWW-02-ZZ-DR-A-02233-P02 Elevation courtyard South West, received 26 July 2022  
 4469-AWW-02-ZZ-DR-A-02236-P02 Detailed bay elevation, received 26 July 2022  
 4469-AWW-03-00-DR-A-02320-P05 Hub ground floor plan, received 26 July 2022  
 4469-AWW-03-02-DR-A-02322-P05 Hub second floor plan, received 26 July 2022  
 4469-AWW-03-RF-DR-A-02323-P03 Hun roof pan, received 26 July 2022  
 4469-AWW-03-ZZ-DR-A-02330-P02 Hub North East elevation, received 26 July 2022  
 4469-AWW-03-ZZ-DR-A-02331-P02 Hub South elevation, received 26 July 2022  
 4469-AWW-03-ZZ-DR-A-02333-P02 Hub details bay elevation, received 26 July 2022  
 4469-AWW-04-00-DR-A-02420-P04 Gateway building ground floor plan, received 26 July 2022  
 4469-AWW-04-01-DR-A-02421-P04 Gateway building first floor plan, received 26 July 2022  
 4469-AWW-04-02-DR-A-02422-P04 Gateway building second floor plan, received 26 July 2022  
 4469-AWW-04-RF-DR-A-02423-P02 Gateway building roof plan, received 26 July 2022  
 4469-AWW-04-ZZ-DR-A-02424-P02 Gateway building typical 1 bed apartment, received 26 July 2022  
 4469-AWW-04-ZZ-DR-A-02430-P02 Gateway building details North and East elevation, received 26 July 2022  
 4469-AWW-04-ZZ-DR-A-02431-P02 Gateway building details South West elevation, received 26 July 2022  
 4469-AWW-04-ZZ-DR-A-02433-P02 Gateway building details bay elevation, received 26 July 2022  
 4469-AWW-ZZ-02-DR-A-02107-P04 Proposed second floor plan, received 26 July 2022  
 4469-AWW-ZZ-XX-DR-A-02113-P02 Proposed street elevation Vassall Road and Gill Avenue, received 26 July 2022  
 4469-AWW-ZZ-XX-DR-A-02115-P02 Proposed site section, received 26 July 2022  
 4469-AWW-ZZ-XX-DR-A-02120-P02 Overshadowing analysis, received 26 July 2022  
 4469-AWW-ZZ-XX-DR-A-02124-P02 Daylight analysis section, received 26 July 2022  
 4469-AWW-ZZ-ZZ-DR-A-02103-P04 Existing site layout, received 26 July 2022  
 4469-AWW-ZZ-ZZ-DR-A-02112-P02 Existing street elevation, received 26 July 2022  
 4469-AWW-ZZ-ZZ-DR-A-02129-P02 South boundary sheet 1, received 26 July 2022  
 4469-AWW-ZZ-ZZ-DR-A-02130-P02 South boundary sheet 2, received 26 July 2022

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

4469-AWW-ZZ-ZZ-DR-A-02131-P02 West boundary sheet, received 26 July 2022  
 4469-AWW-ZZ-ZZ-DR-A-02131-P02 West boundary sheet, received 26 July 2022  
 RF-108-001 Landscaping, received 26 July 2022  
 12737SK0005B Proposed drainage plan, received 26 July 2022  
 Design and access statement, received 26 July 2022  
 Planning statement, received 26 July 2022  
 Sustainability statement, received 26 July 2022  
 Drainage strategy and flood risk assessment, received 26 July 2022  
 Private drainage, received 26 July 2022  
 ABC report of community involvement, received 26 July 2022  
 Air quality, received 26 July 2022  
 Arboricultural impact assessment and tree protection plan, received 26 July 2022  
 Ground investigation report, received 26 July 2022  
 Broadband connectivity statement, received 26 July 2022  
 Framework travel plan, received 26 July 2022  
 Landscaping design statement, received 26 July 2022  
 Transport statement, received 26 July 2022  
 Utilities statement, received 26 July 2022

Reason: For the avoidance of doubt.

## Advices

## 1 Traffic Regulation Order (TRO)

You are advised that a Traffic Regulation Order (TRO) is required. You must submit a plan to a scale of 1:1000 of an indicative scheme for a TRO, along with timescales for commencement and completion of the development. Please be aware that the statutory TRO process is not straightforward; involving the public advertisement of the proposal(s) and the resolution of any objections.

You should expect a minimum of six months to elapse between the Highway Authority's TRO Team confirming that it has all the information necessary to enable it to proceed and the TRO being advertised. You will not be permitted to implement the TRO measures until the TRO has been sealed, and we cannot always guarantee the outcome of the process.

We cannot begin the TRO process until the appropriate fee has been received. To arrange for a TRO to be processed contact the Highway Authority's Transport Development Management Team at [transportdm@bristol.gov.uk](mailto:transportdm@bristol.gov.uk)

N.B. The cost of implementing any lining, signing or resurfacing required by the TRO is separate to the TRO fees, which solely cover the administration required to prepare, consult, amend and seal the TRO.

## 2 Highway to be Adopted

The development hereby approved includes the construction of new highway. To be considered for adoption and ongoing maintenance at the public expense it must be constructed to the Highway Authority's Engineering Standard Details and terms for the phasing of the development. You are advised that you must enter into a highway agreement under Section 38 of the Highways Act 1980. The development will be bound by Sections 219 to 225 (the Advance Payments Code) of the Highways Act 1980.

Contact the Highway Authority's Transport Development Management Team at [DMengineering@bristol.gov.uk](mailto:DMengineering@bristol.gov.uk) You will be required to pay fees to cover the council's costs in



**Development Control Committee A – 26 April 2023**  
**Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

undertaking the following actions:

- I. Drafting the Agreement
- II. Set up costs
- III. Approving the highway details
- IV. Inspecting the highway works

To discuss the requirement for sewers contact the Highway Authority's Flood Risk Management Team at [flood.data@bristol.gov.uk](mailto:flood.data@bristol.gov.uk) You should enter into discussions with statutory undertakers as soon as possible to co-ordinate the laying of services under any new highways to be adopted by the Highway Authority.

N.B. The Highway Authority's technical approval inspection fees must be paid before any drawings will be considered and approved. Once technical approval has been granted a Highway Agreement under Section 38 of the Highways Act 1980 must be completed and the bond secured.

3 Impact on the highway network during construction

The development hereby approved and any associated highway works required, is likely to impact on the operation of the highway network during its construction (and any demolition required). You are advised to contact the Highway Authorities Network Management Team at [traffic@bristol.gov.uk](mailto:traffic@bristol.gov.uk) before undertaking any work, to discuss any temporary traffic management measures required, such as footway, Public Right of Way, carriageway closures or temporary parking restrictions a minimum of eight weeks prior to any activity on site to enable Temporary Traffic Regulation Orders to be prepared and a programme of Temporary Traffic Management measures to be agreed.

4 Restriction of Parking Permits - Future Controlled Parking Zone/Residents Parking Scheme

You are advised that the Local Planning Authority has recommended to the Highways Authority that on the creation of any Controlled Parking Zone/Residents Parking Scheme area which includes the development, that the development shall be treated as car free / low-car and the occupiers are ineligible for resident parking permits as well as visitors parking permits if in a Residents Parking Scheme.

5 Highway Condition Survey

The development hereby approved includes the carrying out of a Highway Condition Survey. To agree the extent of the area to be surveyed contact the Highway Authority's Transport Development Management Team at [transportDM@bristol.gov.uk](mailto:transportDM@bristol.gov.uk)

6 Works on the Public Highway

The development hereby approved includes the carrying out of work on the adopted highway. You are advised that before undertaking work on the adopted highway you must enter into a highway agreement under Section 278 of the Highways Act 1980 with the council, which would specify the works and the terms and conditions under which they are to be carried out.

Contact the Highway Authority's Transport Development Management Team at [transportDM@bristol.gov.uk](mailto:transportDM@bristol.gov.uk) allowing sufficient time for the preparation and signing of the Agreement. You will be required to pay fees to cover the council's costs in undertaking the following actions:

- I. Drafting the Agreement

**Development Control Committee A – 26 April 2023****Application No. 22/03476/F : The Vassall Centre Gill Avenue Bristol BS16 2QQ**

- II. A Monitoring Fee equivalent to 15% of the planning application fee
- III. Approving the highway details
- IV. Inspecting the highway works

NB: Planning permission is not permission to work in the highway. A Highway Agreement under Section 278 of the Highways Act 1980 must be completed, the bond secured and the Highway Authority's technical approval and inspection fees paid before any drawings will be considered and approved.

## 7 Private Road

You are advised that as a result of the proposed layout and construction of the internal access road, the internal access road will not be accepted for adoption by the Highway Authority under Section 38 of the Highways Act 1980.

The development will be bound by Sections 219 to 225 (the Advance Payments Code) of the Highways Act 1980, unless and until you agree to exempt the access road.

The exemption from adoption will be held as a Land Charge against all properties within the application boundary. Contact the Highway Authorities Transport Development Management Team at [DMEngineering@bristol.gov.uk](mailto:DMEngineering@bristol.gov.uk)

## 8 Street Name and Numbering

You are advised that to ensure that all new properties and streets are registered with the emergency services, Land Registry, National Street Gazetteer and National Land and Property Gazetteer to enable them to be serviced and allow the occupants access to amenities including but not limited to; listing on the Electoral Register, delivery services, and a registered address on utility companies databases, details of the name and numbering of any new house(s) and/or flats/flat conversion(s) on existing and/or newly constructed streets must be submitted to the Highway Authority.

Any new street(s) and property naming/numbering must be agreed in accordance with the Councils Street Naming and Property Numbering Policy and all address allocations can only be issued under the Town Improvement Clauses Act 1847 (Section 64 & 65) and the Public Health Act 1925 (Section 17, 18 & 19). Please see [www.bristol.gov.uk/registeraddress](http://www.bristol.gov.uk/registeraddress)

## 9 Travel Plan Statement / Travel Plan - Not Submitted

You are advised that a Travel Plan Statement / Travel Plan is required to be prepared and submitted using the Travel Plan Guide for New Developments and the associated templates at [www.bristol.gov.uk/travelplans](http://www.bristol.gov.uk/travelplans)

## 10 Freight Consolidation

You are advised that to reduce the impact of delivery vehicles servicing the development a freight consolidation scheme can be utilised. Further details about freight consolidation are available at [www.travelwest.info/freight](http://www.travelwest.info/freight)

## 11 Excavation Works on the Adopted Highway

The development hereby approved includes the carrying out of excavation works on the adopted highway. You are advised that before undertaking any work on the adopted highway you will require a Section 171 (Excavation) Licence from the Highway Authority which is available at [www.bristol.gov.uk/highwaylicences](http://www.bristol.gov.uk/highwaylicences)

## Supporting Documents

### 2. The Vassell Centre, Gill Avenue, BS16 2QQ.

1. Location Plan
2. Existing Site Plan
3. Proposed Site Plan
4. Proposed Site Ground Floor Plan
5. HfoP Ground Floor Plan
6. Proposed Elevations
7. Overshadowing
8. Site Sections
9. Landscaping

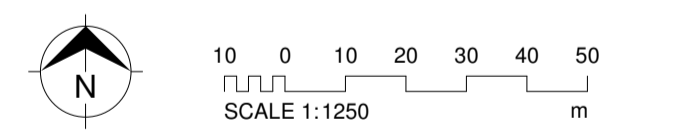


Page 860

**Notes**  
 Do not scale from this document, unless for the purposes of planning applications where a scale bar is provided. Refer to figured dimensions only. All dimensions to be verified on site prior to construction. Report all discrepancies or ambiguities to the Document Originator immediately. This document is to be read in conjunction with relevant documents, drawings and standards.

- Application site boundary
- Site ownership boundary

Rev	Date	Notes	Dm	Chk'd
P03	29.06.22	Final Planning Issue	LI	DP
P02	22.06.22	Planning Issue	LI	DP
P01	31.05.2022	General amendments	LI	DP



Document Originator  
**AWW**  
 London 106 Weston Street, SE1 3QB 020 7160 6000  
 Plymouth East Quay House, PL4 0HX 01752 261 262  
 Bristol plot + mark, 48-52 Baldwin Street, BS1 1QB 0117 923 2535  
 RIBA Chartered Practice [www.aww-uk.com](http://www.aww-uk.com)

Client  
 Bristol Charities

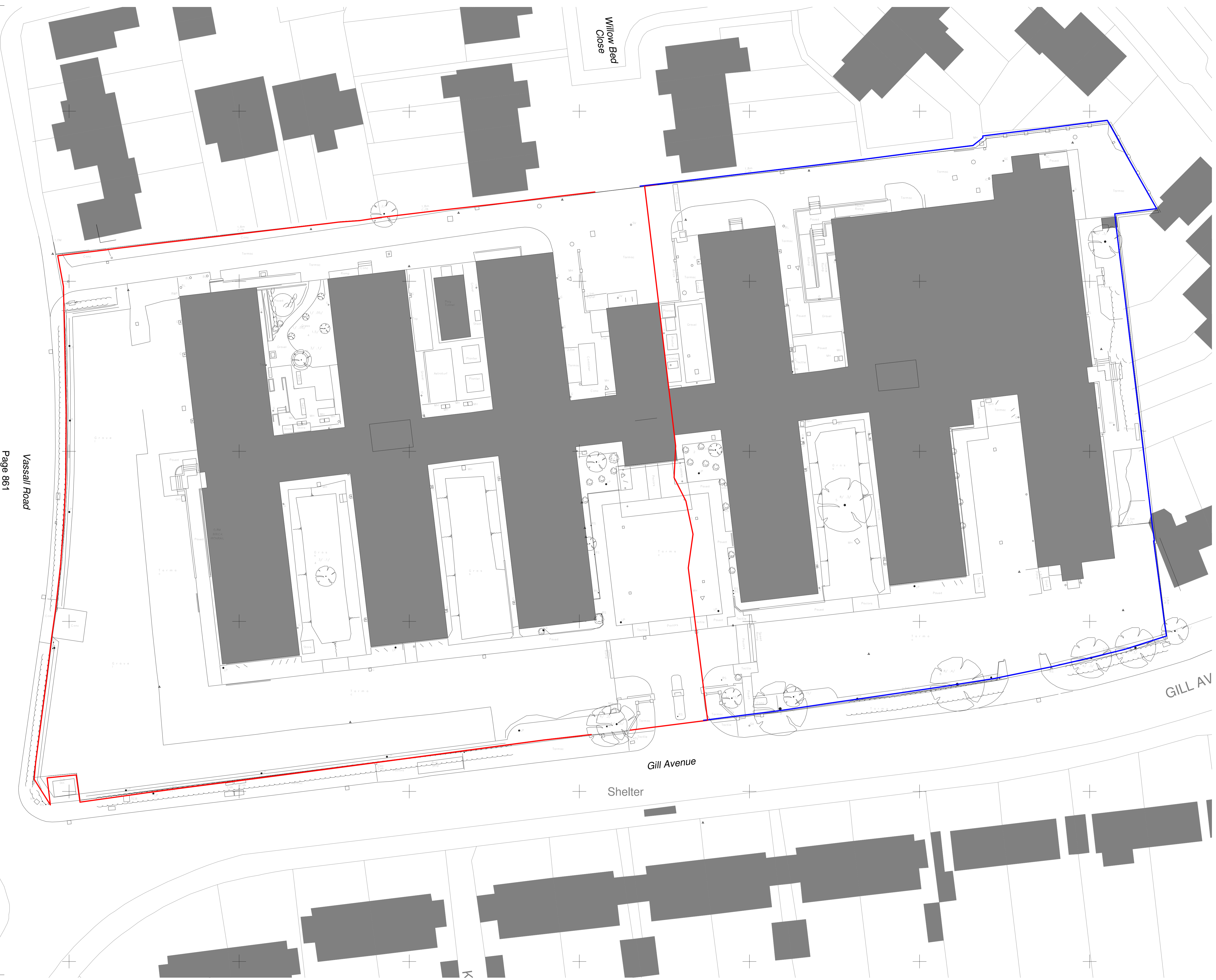
AWW Project Number 4469 Project Stage RIBA Stage 2

Project Title  
 Vassall Centre  
 Fishponds, Bristol

Title  
 Site Location Plan

Scale @ A1 Document Status  
 1 : 1250 S4 - Suitable for Stage Approval

Project	Origin	Volume	Level	Type	Role	Number	Rev
4469	AWW	ZZ	ZZ	DR	A	02101	P03



**Notes**  
 Do not scale from this document, unless for the purposes of planning applications where a scale bar is provided. Refer to figured dimensions only. All dimensions to be verified on site prior to construction. Report all discrepancies or ambiguities to the Document Originator immediately. This document is to be read in conjunction with relevant documents, drawings and standards.

- Application site boundary
- Site ownership boundary

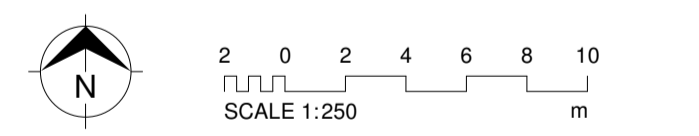
Willow Bed Close

GILL AV

Gill Avenue

Shelter

Rev	Date	Notes	Dm	Chk'd
P04	29.06.22	Final Planning Issue	LI	DP
P03	22.06.22	Planning Issue	LI	DP
P02	31.05.2022	General amendments	LI	DP
P01	25.05.2022	General amendments	LI	DP



Document Originator  
**AWW**  
 London 106 Weston Street, SE1 3GB 020 7160 6000  
 Plymouth East Quay House, PL4 6HX 01752 261 282  
 Bristol pivot + mark, 48-52 Baldwin Street, BS1 1QB 0117 923 2535  
 RIBA Chartered Practice [www.aww-uk.com](http://www.aww-uk.com)

Client  
 Bristol Charities

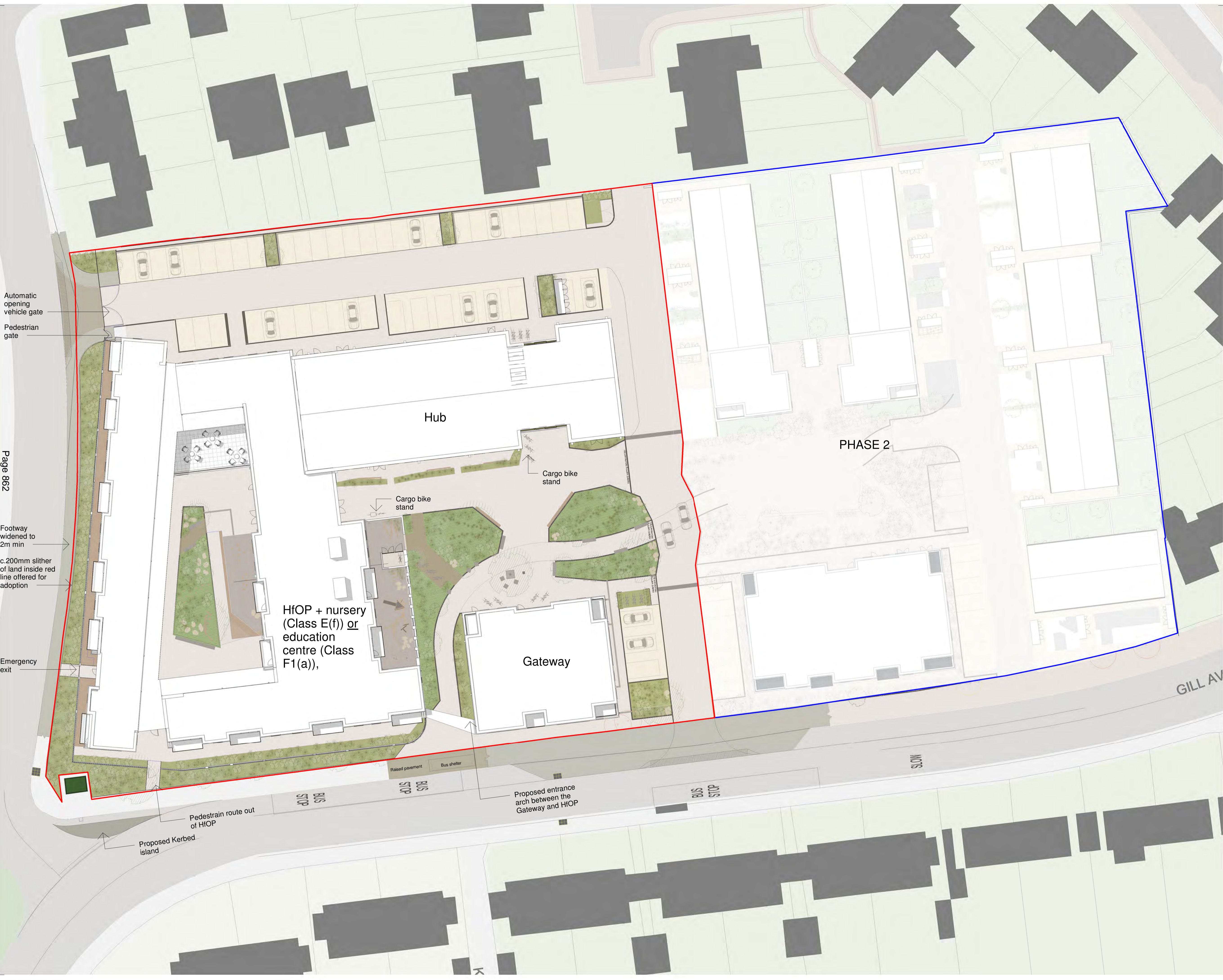
AWW Project Number 4469 Project Stage RIBA Stage 2

Project Title  
 Vassall Centre  
 Fishponds, Bristol

Title  
 Existing Site Layout Plan

Scale @ A1 1:250 Document Status S4 - Suitable for Stage Approval

Project	Origin	Volume	Level	Type	Role	Number	Rev
4469	AWW	ZZ	ZZ	DR	A	02103	P04



Automatic opening vehicle gate  
Pedestrian gate

Page 862

Footway widened to 2m min  
c.200mm slither of land inside red line offered for adoption

Emergency exit

Proposed Kerbed island  
Pedestrian route out of HFOP

HFOP + nursery (Class E(f)) or education centre (Class F1(a)),

Hub

Gateway

Cargo bike stand

Cargo bike stand

PHASE 2

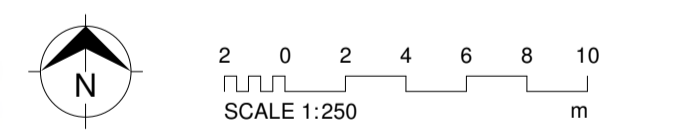
Proposed entrance arch between the Gateway and HFOP

Notes  
Do not scale from this document, unless for the purposes of planning applications where a scale bar is provided. Refer to figured dimensions only. All dimensions to be verified on site prior to construction. Report all discrepancies or ambiguities to the Document Originator immediately. This document is to be read in conjunction with relevant documents, drawings and standards.

- Application site boundary
- Site ownership boundary

Application site area: 0.72ha  
Overall site area: 1.23ha

Rev	Date	Notes	Dm	Chk'd
P08	20.02.23	Nursery updated to nursery (Class E(f)) or education centre (Class F1(a))	LI	DP
P07	23.11.22	Cafe bin store relocated	LI	DP
P06	11.11.22	Updates following planning officer comments	LI	DP
P05	29.06.22	Final Planning Issue	LI	DP
P04	22.06.22	Planning Issue	LI	DP
P03	31.05.2022	General amendments	LI	DP
P02	25.05.2022	General amendments	LI	DP
P01	08.04.2022	General amendments	DP	LI



Document Originator  
**AWW**  
London 106 Weston Street, SE1 3GB 020 7160 6000  
Plymouth East Quay House, PL4 0HX 01752 261 262  
Bristol pivot + mark, 48-52 Baldwin Street, BS1 1QB 0117 923 2535  
RIBA Chartered Practice www.aww-uk.com

Client  
Bristol Charities

AWW Project Number 4469  
Project Stage RIBA Stage 2

Project Title  
Vassall Centre  
Fishponds, Bristol

Title  
Proposed Site Plan

Scale @ A1 1:250  
Document Status S4 - Suitable for Stage Approval

Project	Origin	Volume	Level	Type	Role	Number	Rev
4469	AWW	ZZ	ZZ	DR	A	02104	P08

**Notes**  
 Do not scale from this document, unless for the purposes of planning applications where a scale bar is provided. Refer to figured dimensions only. All dimensions to be verified on site prior to construction. Report all discrepancies or ambiguities to the Document Originator immediately. This document is to be read in conjunction with relevant documents, drawings and standards.

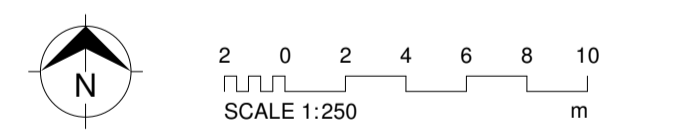
- Application site boundary
- Site ownership boundary

**Accommodation Key**

- 1 Bed Apartment
- 2 Bed Apartment
- 2 Bed House
- 2 Bed Maisonette WCA
- 3 Bed House
- 3 Bed House WCA
- Apartments Ancillary/Communal
- Apartments Circulation
- Cafe
- Community space
- Community space ancillary
- Community space circulation
- HfoP 1 Bed Apartment
- HfoP 2 Bed Apartment WCA
- HfoP Ancillary
- HfoP Circulation
- HfoP Communal
- Hub - Lettable space
- Hub Ancillary
- Hub Circulation
- Hub Communal
- Maisonette Circulation
- nursery (Class E(f)) or education centre (Class F1(a))
- Supported housing - Ancillary
- Supported housing - Circulation
- Supported housing - Stair

PHASE 2  
(Illustrative only)

Rev	Date	Notes	Dm	Chk'd
P08	20.02.23	Nursery updated to nursery (Class E(f)) or education centre (Class F1(a))	LI	DP
P07	17.11.22	Dimensions added	LI	DP
P06	11.11.22	Updates following planning officer comments	LI	DP
P05	29.06.22	Final Planning Issue	LI	DP
P04	22.06.22	Planning Issue	LI	DP
P03	13.06.2022	General amendments	DCP	DP
P02	30.05.2022	General amendments	LI	DP
P01	20.05.2022	General amendments	LI	DP



Document Originator  
**AWW**  
 London 106 Western Street, SE1 3QB 020 7160 6000  
 Plymouth East Quay House, PL4 4HX 01752 261 282  
 Bristol pivot + mark, 48-52 Baldwin Street, BS1 1QB 0117 923 2535  
 RIBA Chartered Practice www.aww-uk.com

Client  
 Bristol Charities

AWW Project Number 4469 Project Stage RIBA Stage 2

Project Title  
 Vassall Centre  
 Fishponds, Bristol

Title  
 Proposed site ground floor plan

Scale @ A1 1:250 Document Status S4 - Suitable for Stage Approval

Project	Origin	Volume	Level	Type	Role	Number	Rev
4469	AWW	ZZ	00	DR	A	02105	P08



**Notes**  
 Do not scale from this document, unless for the purposes of planning applications where a scale bar is provided. Refer to figured dimensions only. All dimensions to be verified on site prior to construction. Report all discrepancies or ambiguities to the Document Originator immediately. This document is to be read in conjunction with relevant documents, drawings and standards.

**Accommodation Key**

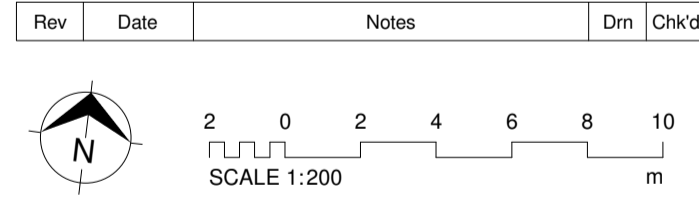
- HfoP 1 Bed Apartment
- HfoP 2 Bed Apartment WCA
- HfoP Ancillary
- HfoP Circulation
- HfoP Communal
- Hub - Lettable space
- Hub Ancillary
- Hub Circulation
- Hub Communal
- nursery (Class E(f)) or education centre (Class F1(a)).



Page 864

**HfoP ground floor**  
 1 : 200

Rev	Date	Notes	Dm	Chk'd
P06	20.02.23	Nursery updated to nursery (Class E(f)) or education centre (Class F1(a))	LI	DP
P05	29.06.22	Final Planning Issue	LI	DP
P04	22.05.22	Planning Issue	LI	DP
P03	13.05.2022	General amendments	DCP	DP
P02	20.05.2022	General amendments	LI	DP
P01	08.04.2022	General amendments	DP	LI



Document Originator  
**AWW**  
 London 106 Weston Street, SE1 3GB 020 7160 6000  
 Plymouth East Quay House, PL4 0HX 01752 261 282  
 Bristol pivot + mark, 48-52 Baldwin Street, BS1 1QB 0117 923 2535  
 RIBA Chartered Practice www.aww-uk.com

Client  
 Bristol Charities

AWW Project Number 4469 Project Stage RIBA stage 2

Project Title  
 Vassall Centre  
 Fishponds, Bristol

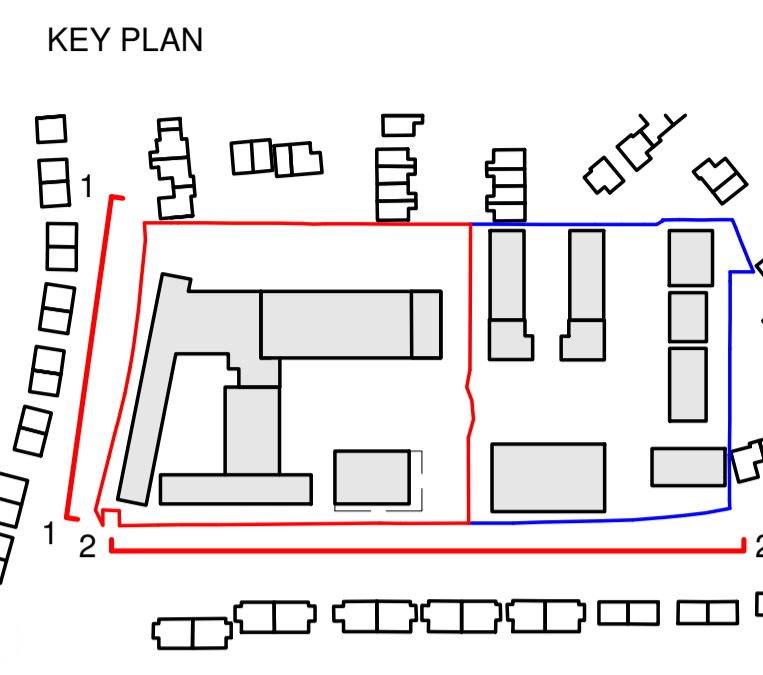
Title  
 HfoP ground floor plan

Scale @ A1 1:200 Document Status S4 - Suitable for Stage Approval

Project	Origin	Volume	Level	Type	Role	Number	Rev
4469	AWW	02	00	DR	A	02220	P06



**Notes**  
 Do not scale from this document, unless for the purposes of planning applications where a scale bar is provided. Refer to figured dimensions only. All dimensions to be verified on site prior to construction. Report all discrepancies or ambiguities to the Document Originator immediately. This document is to be read in conjunction with relevant documents, drawings and standards.



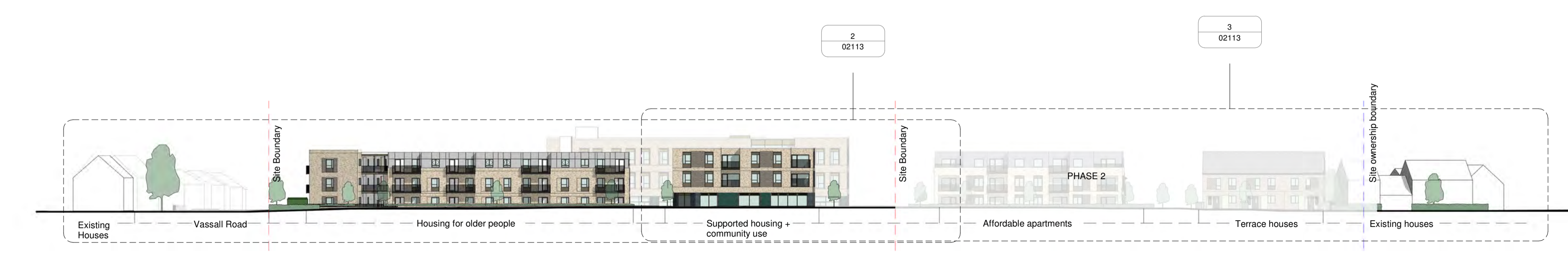
**Proposed elevation 1 along Vassall Road**  
 1 : 200



**Proposed Gill Avenue elevation 2 - Part 1**  
 1 : 200



**Proposed Gill Avenue elevation 2 Part 2**  
 1 : 200



Rev	Date	Notes	Dm	Chk'd
P02	29.06.22	Final Planning Issue	LI	DP
P01	22.06.22	Planning Issue	LI	DP



Document Originator  
**AWW**  
 London 106 Western Street, SE1 3GB 020 7160 6000  
 Plymouth East Quay House, PL4 0HX 01752 261 262  
 Bristol plot + mark, 48-52 Baldwin Street, BS1 1QB 0117 923 2535  
 RIBA Chartered Practice www.aww-uk.com

Client  
 Bristol Charities

AWW Project Number 4469 Project Stage RIBA Stage 2

Project Title  
 Vassall Centre  
 Fishponds, Bristol

Title  
 Proposed street elevations - Vassall Road & Gill Avenue

Scale @ A1 Document Status  
 As indicated S4 - Suitable for Stage Approval

Project	Origin	Volume	Level	Type	Role	Number	Rev
4469	AWW	ZZ	XX	DR	A	02113	P02

Page 869

Notes  
Do not scale from this document, unless for the purposes of planning applications where a scale bar is provided. Refer to figured dimensions only. All dimensions to be verified on site prior to construction. Report all discrepancies or ambiguities to the Document Originator immediately. This document is to be read in conjunction with relevant documents, drawings and standards.

Application site boundary  
Phase 2 site boundary

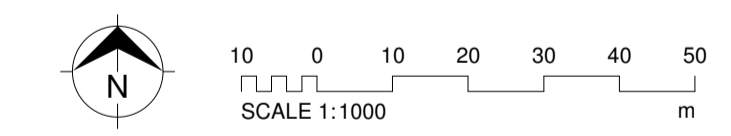
**March 21st**  
Sunrise: 06:11  
Sunset: 18:25

In accordance with BRE guidance ' at least half of a garden or amenity area should receive at least 2 hours of daylight on 21st March' 3.3.17 BR 209

The sun study plans demonstrate that the proposals do not prohibit the surrounding gardens from receiving at least 2 hours of direct sunlight on 21st March.

BRE guidance states that if the angle to the horizontal between the centre line of the lowest window and the proposed development is less than 25 degrees then the new development is 'unlikely to have a substantial effect on the diffuse skylight enjoyed by the existing building' 2.2.5 BR 209

P02	29.06.22	Final Planning Issue	LI	DP
P01	22.06.22	Planning Issue	LI	DP



Document Originator  
**AWW**  
London 106 Weston Street, SE1 3QB 020 7160 6000  
Plymouth East Quay House, PL4 0HX 01752 261 262  
Bristol plot + mark, 48-52 Baldwin Street, BS1 1QB 0117 923 2535  
RIBA Chartered Practice www.aww-uk.com

Client  
Bristol Charities

AWW Project Number 4469 Project Stage RIBA Stage 2

Project Title  
Vassall Centre  
Fishponds, Bristol

Title  
Overshadowing analysis - 21st March

Scale @ A1 Document Status  
As indicated S4 - Suitable for Stage Approval

Project	Origin	Volume	Level	Type	Role	Number	Rev
4469	AWW	ZZ	XX	DR	A	02120	P02

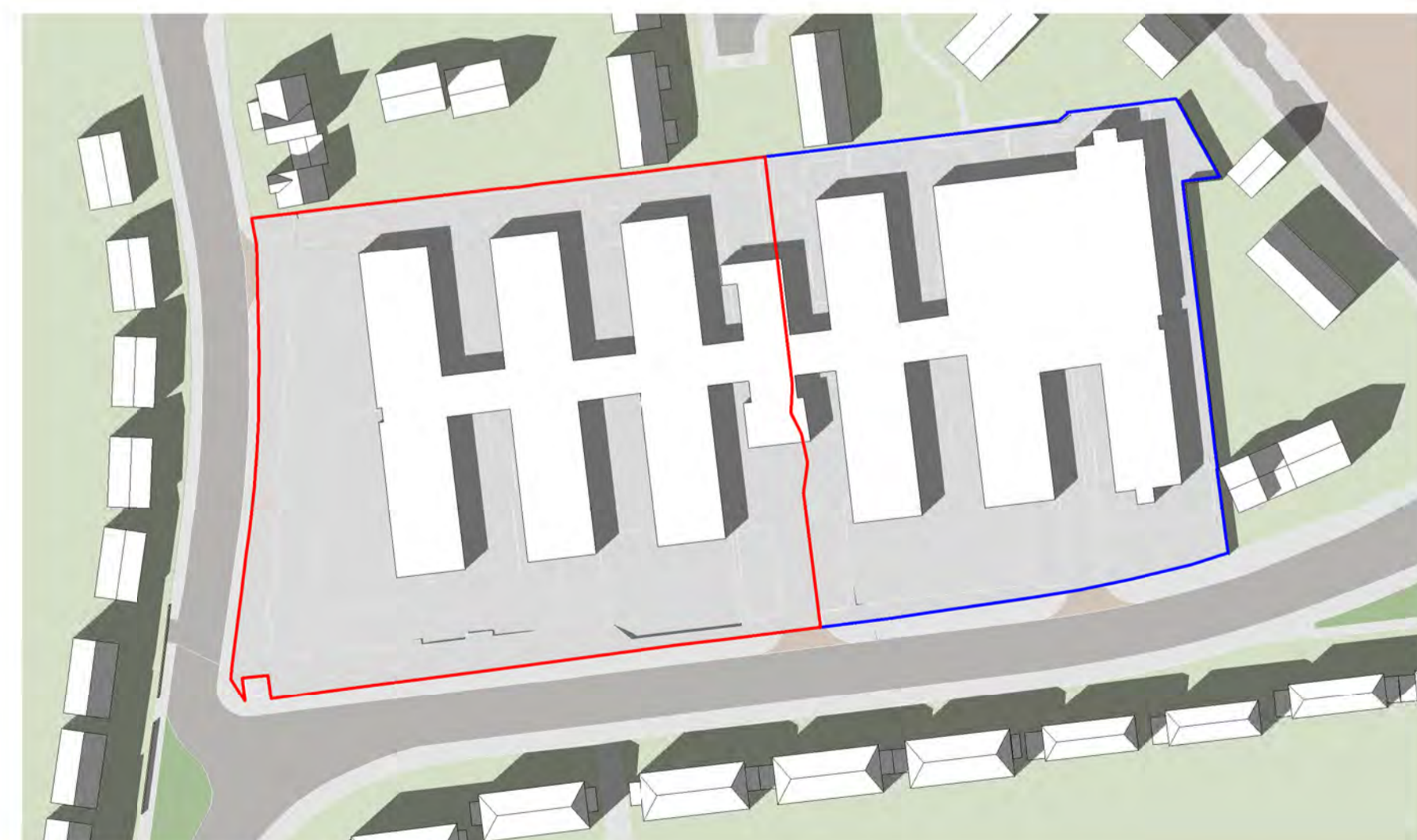
### Existing Vassall Centre Massing



Sun Path - 10am March 21st (Sunrise 06.11) Existing Massing  
1 : 1000

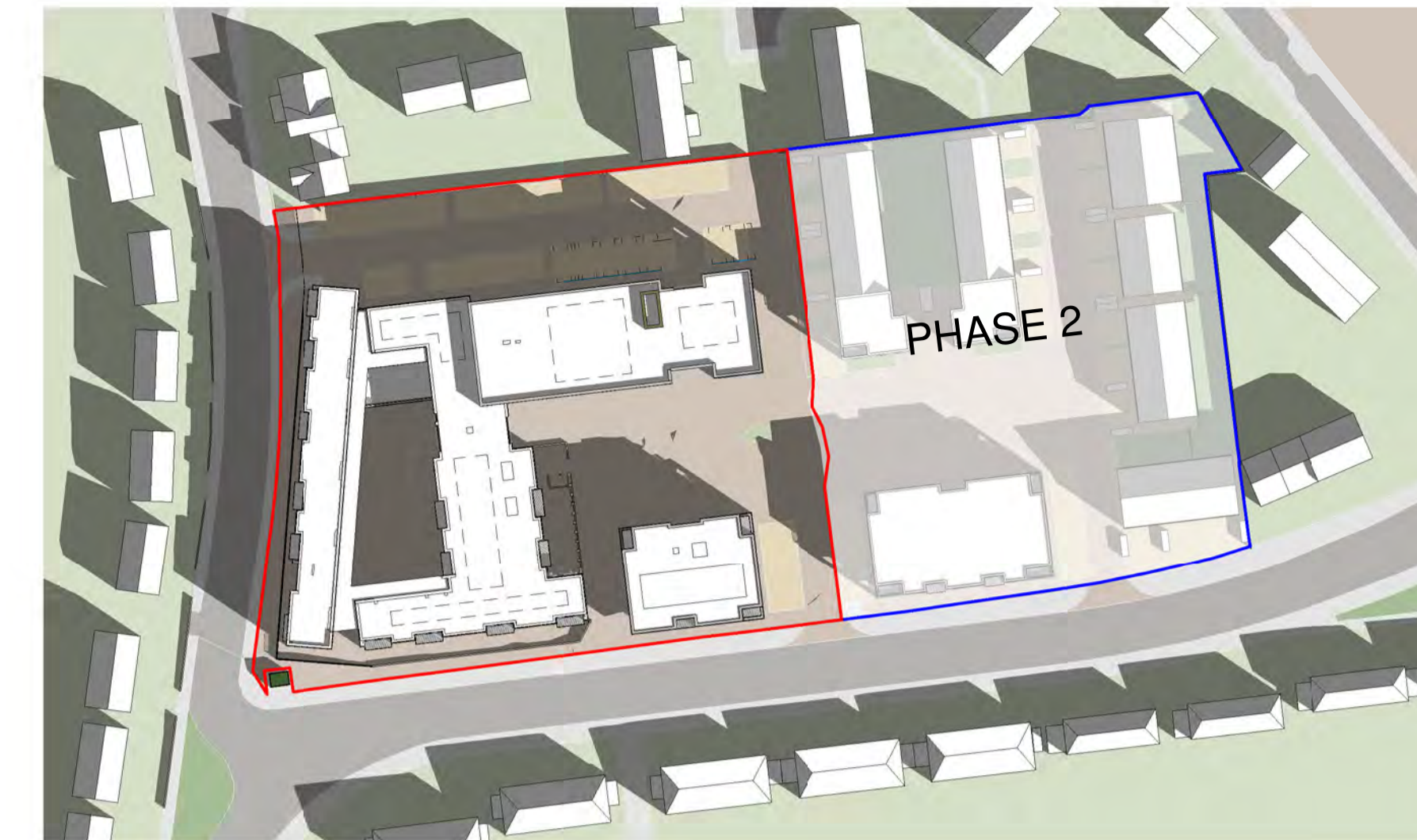


Sun Path - 12am March 21st (Sunrise 08.13) Existing Massing  
1 : 1000

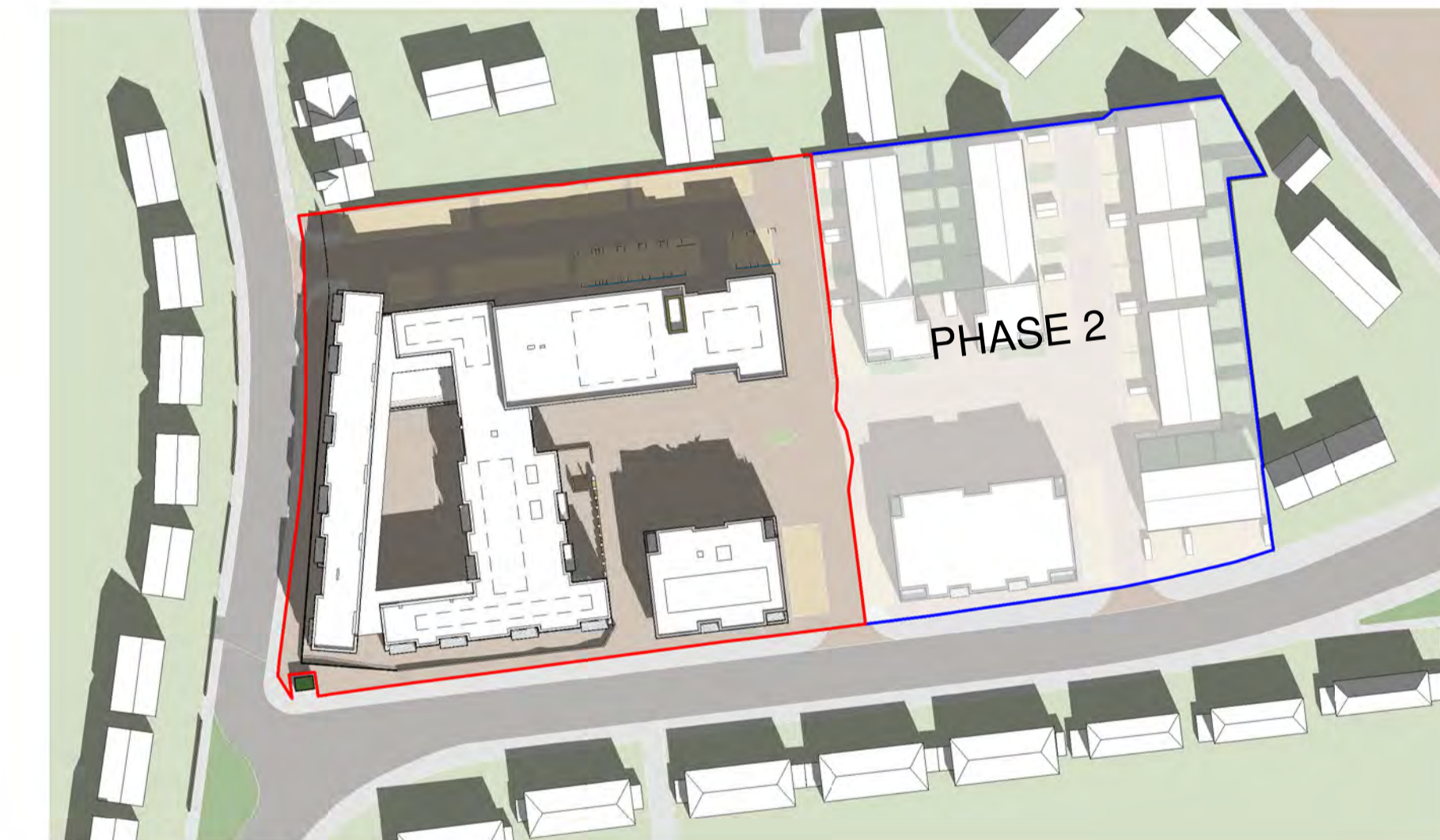


Sun Path - 4pm March 21st (Sunset 18.25) Existing Massing  
1 : 1000

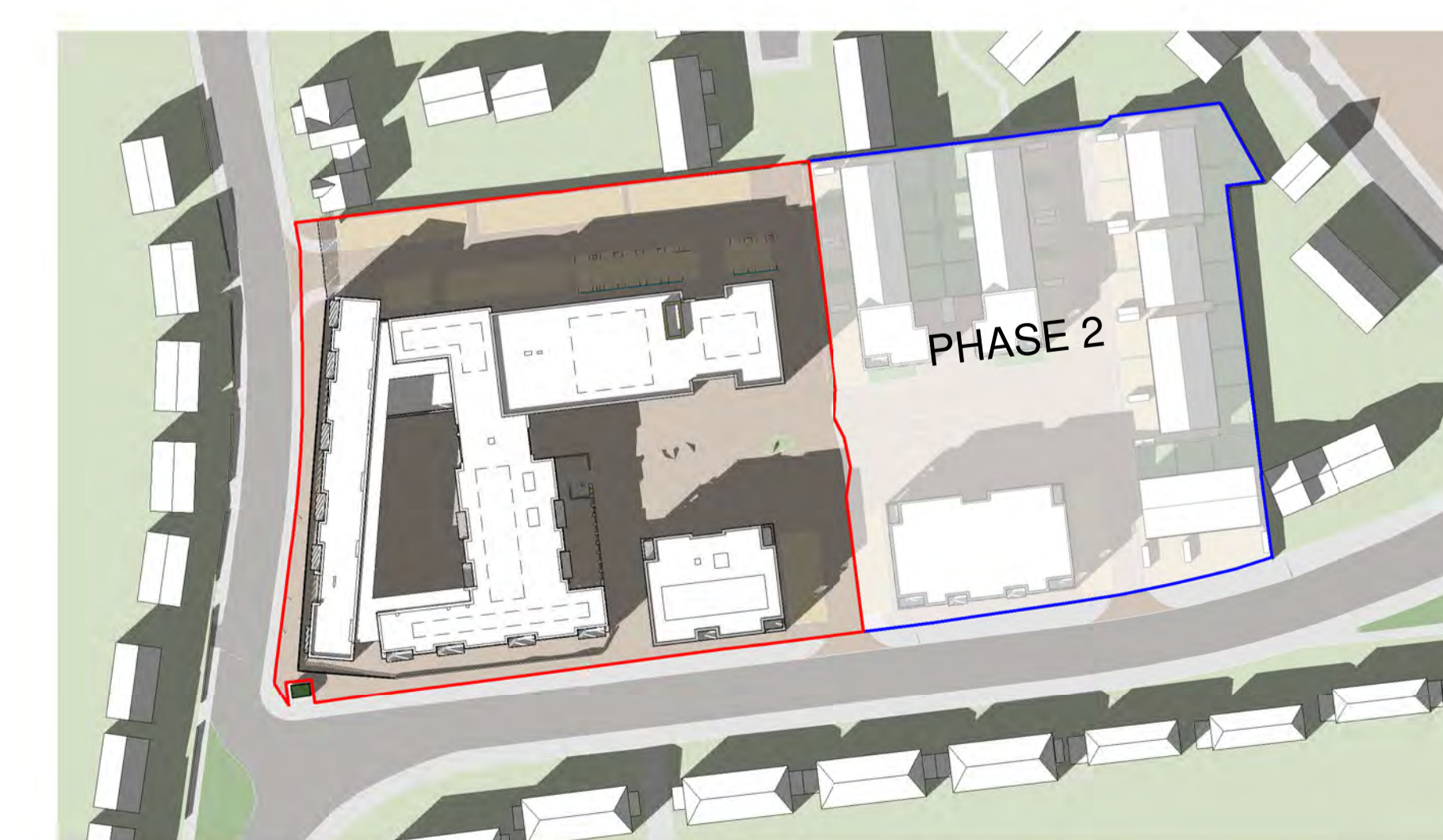
### Proposed Vassall Centre Massing



Sun Path - 10am March 21st (Sunrise 06.11) Proposed Massing  
1 : 1000

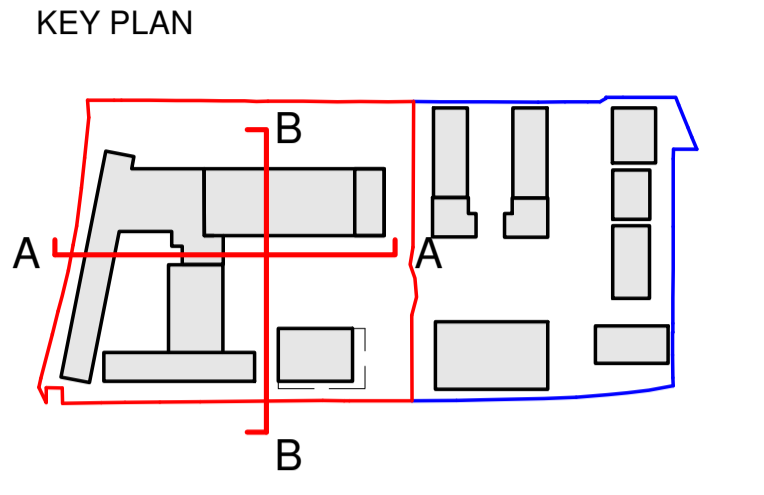


Sun Path - 12pm March 21st  
1 : 1000



Sun Path - 4pm March 21st (Sunset 18.25)  
1 : 1000

**Notes**  
 Do not scale from this document, unless for the purposes of planning applications where a scale bar is provided. Refer to figured dimensions only. All dimensions to be verified on site prior to construction. Report all discrepancies or ambiguities to the Document Originator immediately. This document is to be read in conjunction with relevant documents, drawings and standards.



Phase 2  
in abeyance

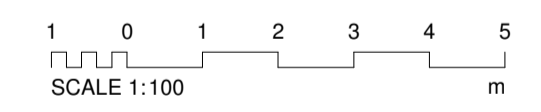
**Proposed site section A**  
1 : 200

Page 867



**Proposed site section B**  
1 : 200

Rev	Date	Notes	Dm	Chkd
P02	29.06.22	Final Planning Issue	LI	DP
P01	22.06.22	Planning Issue	LI	DP



Document Originator  
**AWW**  
 London 106 Weston Street, SE1 3QB 020 7160 6000  
 Plymouth East Quay House, PL4 0HX 01752 261 262  
 Bristol plot + mark, 48-52 Baldwin Street, BS1 1QB 0117 923 2535  
 RIBA Chartered Practice www.aww-uk.com

Client  
Bristol Charities

AWW Project Number 4469 Project Stage RIBA Stage 2

Project Title  
Vassall Centre  
Fishponds, Bristol

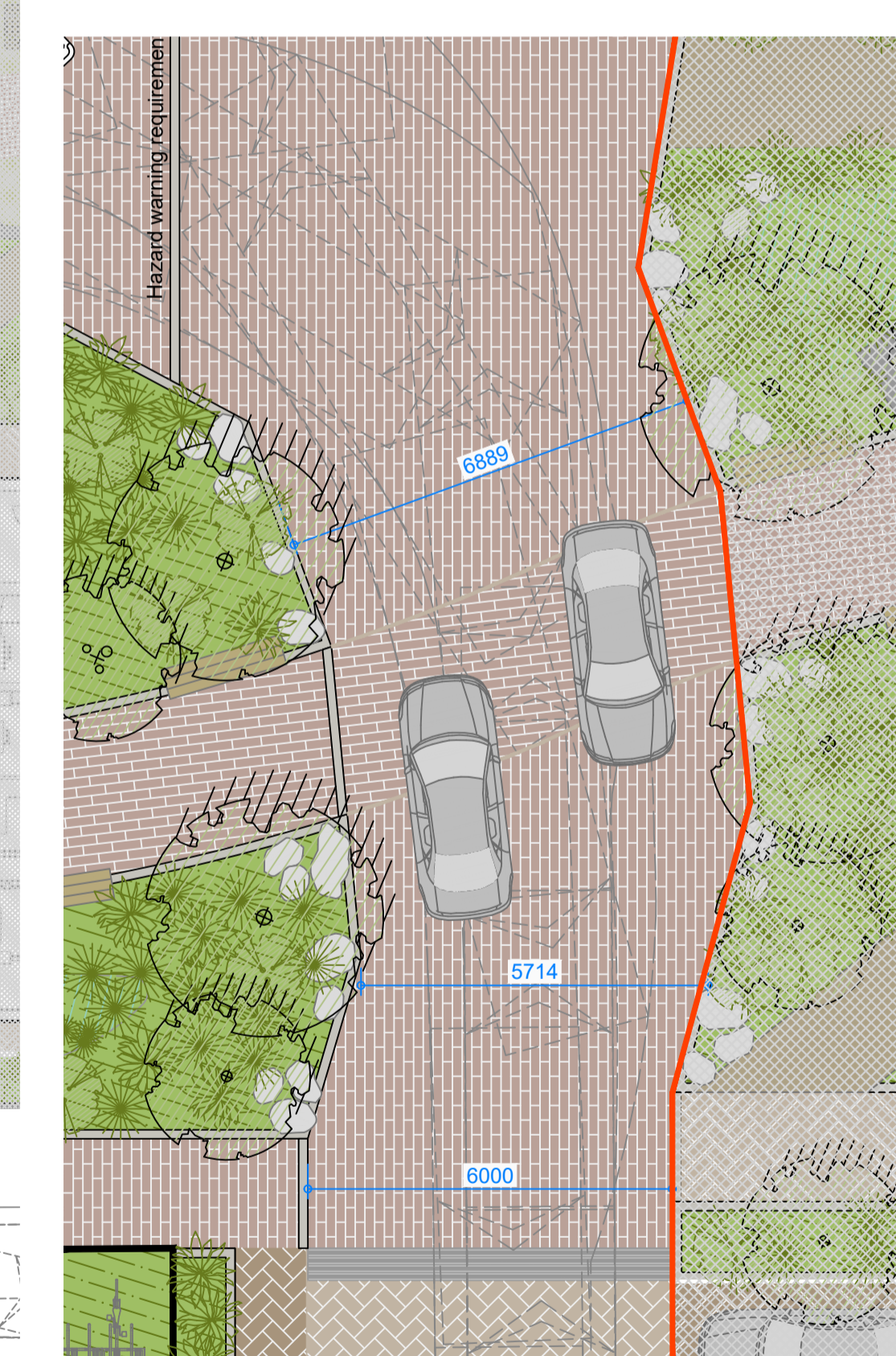
Title  
Proposed site sections

Scale @ A1 Document Status  
As indicated S4 - Suitable for Stage Approval

Project	Origin	Volume	Level	Type	Role	Number	Rev
4469	AWW	ZZ	XX	DR	A	02115	P02



- KEY:**
1. Communal 'breakout' Cafe seating
  2. Outdoor activity space for youth charity
  3. Outdoor nursery space play space indicative layout featuring timber play tower, water play point, robust natural play forms 'window' aperture in the wall facing the central communal landscape for visual connection and interaction
  4. Intergenerational communal courtyard space featuring informal play elements, seating elements, role play 'mini stage' for children to role play to older residents
  5. Outdoor private space for residents
  6. Main pedestrian access from Gill Ave. with legacy tree planting at threshold and SuDS feature leading towards central landscape - biodiverse groundcover planting and multistem tree planting
  7. Low level 'boardwalk' style access to nursery entrance with visitor cycle stands
  8. Central landscape zones feature robust biodiverse groundcover and mounded planting with raised canopy tree planting - acting as bioretention zones receiving rainwater from surrounding paving and rainwater from the gateway building. Informal cube seats and benches punctuate the space allowing for dwell time for workers and residents
  9. Central space based on shared space principles with central spine sinuous pathway ultimately linking phases 1 & 2 - a single high quality clay block aligned to different paving patterns unifies the space with rumble strips at thresholds (see item 10) alerting drivers that this space is primarily for pedestrians
  10. Shared space thoroughfare - rumble strips act as a threshold treatment to the central space
  11. Parking primarily for the gateway building
  12. Main parking courtyard - tree planting and a landscape zone help to signify the entrance to the Hub building
  13. Main vehicular entrance to the site from Vassall Rd - Gateway configuration TBC



**Phase 1 Landscape Plan - Scale 1:200**

All dimensions and sizes to be verified by the Contractor on site. Any discrepancies to be verified with the Landscape Architect before work proceeds. No dimensions to be scaled from this drawing. Contractors must work to figured dimensions. © This drawing is subject to copyright of Roundfield, in accordance with our standard terms and conditions. Where an Ordnance Survey Drawing is shown on this drawing, it is re-produced under Crown copyright ©. All rights reserved.

**Revision History**

Rev	Date	By	Detail
-	22.06.22	JH	Draft issue
A	27.06.22	JH	Draft Planning Issue
B	28.06.22	JH	Draft Planning Issue
C	01.07.22	JH	Planning Issue
D	07.07.22	JH	Planning Issue

**NOTES:**  
A. For further details refer to Landscape Design Statement

**Project/Location**  
Vassall Centre, Bristol

**Drawing title**  
Landscape General Arrangement Plan

**Drawing status**  
PLANNING

Scale(s)	Date	Drawn	Checked
1:200 @A1	13.06.22	JL	JH

**ROUNDFIELD**  
The Old Church School  
Butts Hill  
Frome  
Somerset BA11 1HR

**Client**  
Bristol Charities

**Drawing number**  
RF-108-001

**Revision**  
D

