

APPLICATION NO: 16/06311/X Variation/Deletion of a Condition

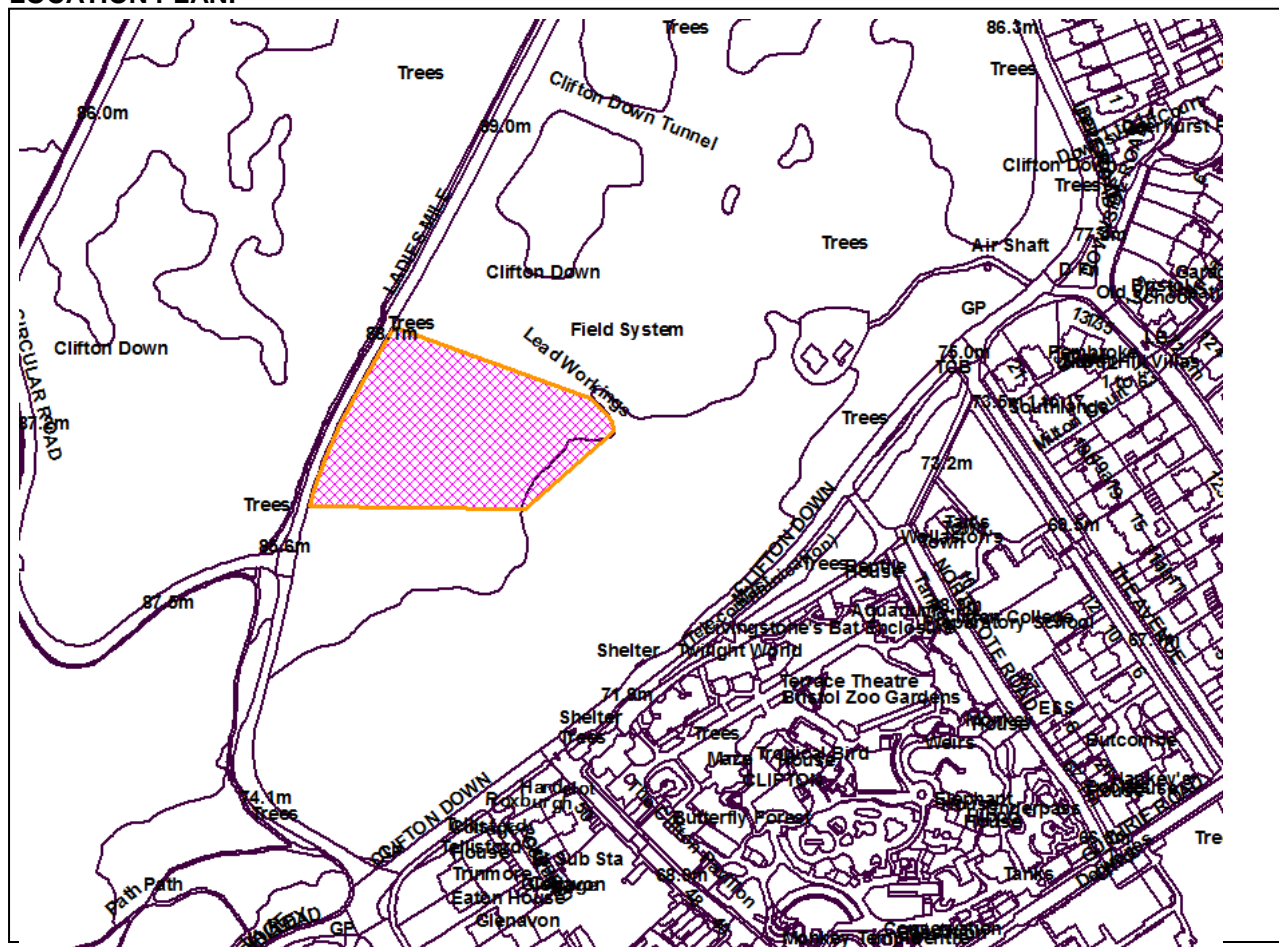
DETERMINATION DEADLINE: 17 January 2017

Application of variation of conditions 1 and 6 for planning permission 13/01140/X

RECOMMENDATION: Grant subject to Condition(s)

AGENT:	Barton Willmore 101 Victoria Street Bristol BS1 6PU	APPLICANT:	Bristol Zoo Gardens Clifton Bristol BS8 3HA
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LOCATION PLAN:



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BACKGROUND AND SUMMARY

The application site comprises a 1.34 hectare area of land which forms part of the Bristol Downs. It is located on the east side of Ladies Mile, close to the junction with Circular Road and is approximately 70 m to the North West of the Bristol Zoological Gardens. In terms of designations it is located within the Downs Conservation Area; is identified as a Historic Landscape; a formal area of Important Space and a city wide site of Nature Conservation Interest.

The Zoo has been using this part of the Downs for overflow visitor car parking with the consent of the Downs Committee since the late 1960's. The period of use increased in 1997 and this resulted in the requirement for planning permission, given that the number of days required by the Zoo was more than the 28 days permitted under planning legislation (The Town and Country Planning, General Permitted Development Order 2015). Clearly the Downs is a sensitive environment and duly protected through well- established policies of the Development Plan. As such the permanent use of the site area for overflow parking is not considered an appropriate option and acknowledging this, the Zoo has secured a series of temporary planning consents since this time.

The latest approval (13/01140/X), under which the Zoo parking on the Downs has been operating, was granted subject to a number of transport measures, including continued use of a Park and Ride service at peak times from The Portway and the adoption of Travel Plans. All such measures were designed to try and achieve a modal shift away from car travel and ultimately to reduce the reliance on this area for parking in the medium to long term.

Unfortunately travel surveys have shown that the majority of the targets set within travel plans not been achieved. In addition the provision of a Park and Ride service from The Portway has seen significantly low levels of use at a relatively high cost. Overall and disappointingly, the hoped for modal shift away from the use of the car has not been achieved.

As part of the submitted application Members will see that the Zoo wishes to discontinue the Park and Ride service but have now increased the level of discount on entry fees available to users of other travel modes, most notably bus and train. Marketing of the improved and new travel options has also improved since 2013, with a recent re-design of the Zoo's website highlighting the discounts available. In terms of the physical impact of the car parking itself on this land, Members will see that concerns have been raised by third parties in respect of the ecology of the site. The submitted ecological reports show the use, although resulting in some minor harm to the condition of the ground and landscape, has not resulted in further harm to the ecology of the grassland and that the condition is able to be remediated by minor works. The Authority's Ecological Officer is satisfied at this stage that the mitigation measures currently in place are acceptable for this temporary use.

It is clear that further consideration is required to ensure that vehicle numbers for visitors; staff and members are reduced and that ultimately the reliance of the car parking on Ladies Mile is minimised without significantly affecting visitor numbers.

It is recognised that the proposed temporary use, for up to 30 days of the year by 2019, and the potential 'harm' that is caused has to be weighed in the balance against other material considerations as the Zoo is clearly an important visitor attraction. However, the possible financial impact the loss of this parking would have on the Zoo or Bristol's tourism economy is not clear, and claims made concerning its severity are questionable. This is a point raised in detail by third parties and the related submissions which cover this issue are appended to this report.

Having considered all of the issues it is recommended that a further temporary consent for 3 years be granted. Officers come to this recommendation with the view that the ultimate objective for all concerned should be to reduce the reliance of the Downs for Zoo parking and this might only be

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achieved by limiting visitor choice. Proposing to progressively limit the use of the Downs to 30 days by 2019 demonstrates a commitment by the Zoo to do this, as does a letter received by the Zoo, advising that “...BZG [Bristol Zoological Gardens] has no intention to re-apply for the extended use of land off Ladies Mile for controlled overflow parking in three years’ time. This is on the basis that there is no material change that might affect our visitors’ ability to arrive by public transport”.

It is hoped that after the 3 year period, measures will be in place so that the Zoo keep to their word and do not have to again apply for an extension of parking on Ladies Mile. In moving this issue forward during the life of this permission, your Officers will be working closely with the Zoo to help towards a solution and prepare for the time in 2020 when planning consent has expired.

PLANNING HISTORY

The use of the Downs for the parking of vehicles in association with the Zoo has taken place since the late 1960's when The Downs Committee permitted 6 days parking per year. The number of days increased to 28 days per year in 1990.

In 1997 The Downs Committee gave consent for the Zoo to use Ladies Mile land for car parking for a period of 81 days per year. This approval meant that the Zoo exceeded its permitted development rights for parking on the Downs (28 days) and the following planning permissions have subsequently been approved:

98/00276/F/N: To use part of the Downs for car parking for 81 days a year for a period of 3 years. Approved subject to conditions, including the following:

The use hereby permitted is only for the parking of cars and shall take place only between the period of 1 March to 31 October 1999, for a maximum of 81 days during the hours of 0900 - 1830 only.

Reason: Because a permanent use for this area of land for car parking would be unacceptable and to enable the Zoo to implement the transport strategy as set out in their letter of 3 February 1999 and other measures that shall be agreed.

00/00553/F/N: Use of land for a temporary car park for 60 days each calendar year for the next 3 years. Approved subject to conditions, including the following:

The use hereby permitted is only for the parking of cars between the hours of 0900 - 1830 only and shall take place only between the period of 1 March to 31 October during 2000 for a maximum of 60 days, 2001 for a maximum of 50 days and 2002 for a maximum of 40 days.

Reason: Because a permanent use of the Downs for car parking would be unacceptable.

02/04353/F: Use of land for overflow car parking for 60 days in each calendar year (Bristol Zoo). Temporary consent for a 2 year period was granted by Committee on 24.09.2003 subject to conditions and the signing of a S106 agreement. This agreement was signed on 15 March 2006. The conditions applied to the permission were as follows:

1. The use hereby permitted shall be discontinued and the land restored to its former condition on or before 2 calendar years from the date of this permission.

Reason: A permanent use of The Downs for car parking would be unacceptable and contrary to Adopted Bristol Local Plan (December 1997) and policies in the First Deposit Proposed Alterations to the Bristol Local Plan (February 2003).

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2. The use hereby permitted is only for the parking of cars between the hours of 1000 and 1830 only and shall only take place for a maximum of 60 days in each calendar year commencing from the date of this permission.

Reason: A permanent use of The Downs for car parking would be unacceptable and contrary to Adopted Bristol Local Plan (December 1997) and policies in the First Deposit Proposed Alterations to the Bristol Local Plan (February 2003).

08/01174/T: Renewal of temporary consent - Use of land for controlled overflow car parking for 60 days in each calendar year for a total of 3 years.

However, temporary consent for a 1 year period was granted by Committee to allow the Zoo sufficient time to investigate alternative parking and transport solutions. The permission was granted subject to conditions and the signing of a S106 agreement. This agreement was signed in March 2009 and required the finalisation and monitoring of the visitor, staff and corporate travel plans, annual monitoring of visitor numbers and use of the Downs parking area, participate in discussions with the Council relating to the Coach Park Strategy TROs CPZ Park and Ride Schemes and other transport initiatives in order to further the aims and objectives of the travel Plans and ecological monitoring and management.

09/05111/T, Renewal of temporary planning permission 08/01174/T: Use of land for controlled overflow car parking for up to 60 days in each calendar year, Approved 20.05.2010

The applicant applied for a 5 year consent but this was restricted to 3 years. The permission was subject to a legal agreement requiring the following:

- Implement a Park and Ride service between the Portway Park and Ride site and the Zoo on each Bank Holiday and the preceding Sunday until May 2013 and monitor its use;
- Prepare, implement and update Staff, Visitor and Corporate Visitor Travel Plans;
- Monitor the use of land at Ladies Mile as an overflow car park;
- Improvement of the footpath leading from the Ladies Mile site to the Zoo;
- Undertake annual ecological monitoring of the site.

The latest permission (now expired) is the following:

13/01140/X: Variation of condition 1 attached to temporary planning permission 09/05111/T: to allow use of land for controlled overflow car parking by Bristol Zoo Gardens for a period of 3 years. Approved 12th December 2013.

The applicant again applied for a 5 year consent but this was again restricted to 3 years. The permission was also again subject to a legal agreement requiring the following:

- Submission of a Park and Ride Strategy within 3 months to include continuation of and a significant increase in the operation of the Park and Ride Service(s) to the site, and if the average occupancy level falls to 50% or less, the Society submit proposals for measures to increase patronage.
- Approval of Staff, Corporate and Visitor Travel Plans within 3 months of the decision
- Undertake an annual review of the Travel Plans
- Undertake an annual monitoring survey of the modes of transport used by visitors to the zoo
- Undertake annual ecological monitoring of the site.

The application expired on 12th December 2016.

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APPLICATION

The proposal is for the renewal of the existing temporary planning permission (expired 12th December 2016) for overflow parking on a section of the Downs off Ladies Mile in each calendar year for a period of 3 years as follows:

2017 – 40 days
2018 – 35 days
2019 – 30 days

The application is supported by the following main documents:

- Transport Statement dated November 2016;
- Travel Plan 2016-2019;
- Vegetation Monitoring reports for the past 3 years
- A statement outlining the history of the Zoo and its place in the city

A letter has also been received from the Zoo advising that it: *“... has no intention to re-apply for the extended use of land off Ladies Mile for controlled overflow parking in three years’ time. This is on the basis that there is no material change that might affect our visitors’ ability to arrive by public transport”*.

PRE APPLICATION COMMUNITY INVOLVEMENT

The applicant has engaged in limited pre-application involvement concerning the proposal. As the application does not fall under the ‘Major’ category the submission of a Community Involvement Statement was not a validation requirement. Representatives of the Zoo have met with various stakeholders and community organisations to discuss the continued reduced temporary use of Ladies Mile. The organisations met include:

- Clifton College
- The Avenue Residents’ Association (TARA)
- Clifton Business Improvement District (BID)
- Business West
- Destination Bristol
- Clifton and Hotwells Civic Society
- Merchant Venturers

The applicant states that consultation identified local support for the application and the way that it is active in helping reduce congestion on peak days. Letters of support were received from Clifton College, Clifton BID, Business West and TARA.

There do not appear to be any other specific outcomes from the meetings.

RESPONSE TO PUBLICITY AND CONSULTATION

Press notice published and site notice displayed. Additionally, consultation letters were sent to over 950 local addresses.

A second, limited consultation exercise to seek comments on the final Travel Plan commenced on 28th April 2017 for 14 days. Comments received in response to this consultation will be reported verbally at Committee.

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Public comments:

To date (30/4/2017) some 902 representations have been received, as follows:

Comment	Full text comment	No text – indicate Support/Object only	Total	From Bristol	% from Bristol
Support	680	138	818	456	56%
Object	79	5	84	76	89%
Neutral	7	0	7	5	71%
Total	766	143	909	537	59%

It can be seen that a significant number of representations have been submitted in support of the Zoo's application. Much of this has been the result of appeals for support on the Zoo's website to its members and explains why a high proportion come from outside Bristol (although the Bristol responses also include respondents who stated their address as 'Bristol' but live outside the City Council boundary).

Support:

Comments received in support can be summarised as follows:

Amenity:

- The area used for parking is a very small part of the Downs and its use does not affect the overall enjoyment of the Downs.

Economic:

- The Zoo is one of Bristol's most important tourist attractions and without the extra parking space the Zoo would be very hard hit financially as visitors would be deterred from visiting the Zoo.
- The wider economy of Bristol would suffer through the loss of associated expenditure from visitors to the City.

Transport:

- For many visitors, especially families, there is no realistic option other than to drive to the Zoo.
- A park and ride facility cannot compete with car travel for young families transporting buggies, picnics, etc.
- When the overflow car park is closed, local traffic congestion is very bad, worsening air pollution and deterring visitors from future visits to the Zoo.
- The Zoo has pursued alternative travel plans to reduce dependence upon Downs land off Ladies Mile.
- The use of the site does not create parking problems or hazards.

Other:

- Events are held regularly on the Downs for which organised parking is permitted by the Downs Committee without the need for planning permission.
- The Zoo has attempted to seek alternative means of travel for visitors, staff and volunteers, but most visitors prefer to travel by car.

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- Car occupancy rates are very high (above 3 per car) and therefore sustainable.
- The parking does not interfere with footpaths or detract from views across the Downs.
- The site is well hidden from most of the Downs and so is not prominent.
- The Zoo is involved in great conservation work which would be affected by reduced visitor numbers if this application is refused.

Comments have been received from a Councillor, a local Member of Parliament and organisations in support of the Zoo's proposal as follows:

Councillor Paula O'Rourke:

I don't want to see cars when I walk on the Downs but I accept that there are some peak days when Zoo numbers spike and the over-flow carpark is needed.

The fact that the over-flow carpark was only used for 38 of the 50 allowed days demonstrates that the Zoo limit the days as much as possible. I have also seen that the carpark was closed on a wet day in the summer, so am convinced that the Zoo management maintain the site.

The number of days for the next 3 years will decrease by 5 days each year, allowing the Zoo management to continue their efforts to investigate alternatives.

I have been persuaded that the zoo has rigorously employed incentives to encourage visitors to use public transport and have learnt from any errors in this in the past.

The Zoo is a valuable asset to Bristol and the loss of up to £500K per year, which is what the extra attendances on the busy days when Ladies Mile is used bring in, could jeopardise its future.

Thangam Debbonaire MP:

I am writing in support of Bristol Zoo's temporary planning application for overflow parking provision on Ladies Mile. I feel strongly that as a leading tourist attraction in Bristol, and an important conservation charity, the zoo should be able to benefit from the increase in visitor income generated by the availability of extra parking spaces.

As well as extra parking financially benefitting the zoo, I understand that without temporary parking on Ladies Mile the zoo's economic contribution to the city would decrease by over £2 million per year. This is because research demonstrates that visitors would simply choose not to visit the zoo were there not sufficient parking, rather than choosing other forms of transport.

It is vital for Bristol that the financial contribution is maintained.

I am reassured to hear that the zoo undertakes annual ecological monitoring of the area where cars are parked, and that the resulting surveys have shown that there is no permanent damage caused to the land by parking.

With reference to other parking options, I am aware that technical studies have been commissioned to explore other options and have not been able to find another practical alternative.

Bristol Zoo is one of the city's cultural highlights and I am delighted to be able to offer you my full support. I hope that permission is granted for temporary parking provision on Ladies Mile, so that the zoo can continue to go from strength to strength and continue its enormous contribution to the city.

Clifton BID:**Main points:**

- Ladies Mile is not damaged by the Zoo parking cars on it.
- Families travel by car
- Loss of the overflow car park would be a huge financial loss to the Zoo and an even greater financial loss to the city

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- The Zoo has looked at other parking options. None are available.
- Using the Downs as an overflow car park eases congestion around Clifton

Clifton College:

Repeat three of the above points:

- Loss of the overflow car park would bring a great financial loss to the city
- The Zoo has looked at other parking options. None are available
- Using the Downs as an overflow car park eases congestion around Clifton

Destination Bristol:

- There are no viable alternatives to parking at Ladies Mile
- Ecological surveys have concluded that no damage has been caused to either the land or habitats of Ladies Mile
- The Zoo would suffer a huge financial loss without the additional parking provision resulting in reduced investment back into saving wildlife and enhancing the Bristol visitor experience

The Avenue Residents' Association:

The continued availability of Ladies Mile is essential to avoid congestion, reduce frustration for visitors and avoid unnecessary loss of revenue.

Objection:

Comments received objecting to the proposal can be summarised as follows:

Amenity:

- The days when the overflow car park is in use are the most popular days of the year to use the Downs, such as bank holidays, school holidays and sunny summer weekends. The enjoyment in visiting the Downs is spoiled by the presence of a large, noisy, conspicuous car park.
- The parking creates car fumes in the area, harming the environment used by individuals and families for their leisure.
- The car park is harmful to views.
- The parking by the Zoo is contrary to the Clifton and Durdham Downs (Bristol) Act 1861 which states that: 'the Downs....shall forever hereafter remain open and unenclosed...'
- The use results in noise, congestion, litter and pollution;

Transport:

- Allowing parking results in traffic congestion on the Downs.
- There is adequate public transport for visitors to the Zoo and its use should be expanded and encouraged.
- Park and Ride services should be better utilised.
- Allowing the Zoo to park on the Downs sets a poor example to other motorists.
- The Zoo's Travel Plan does not have a reduction in the number of cars as an objective.
- The Zoo should dissuade people from visiting by car.
- Encouraging parking is contrary to the Council's transport policies.
- The Zoo should consider a shuttle bus service from key transport hubs such as Temple Meads and the Bus Station.
- No serious measures have been introduced to achieve a modal shift away from car travel to the Zoo.

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Economic:

- The information supplied by the Zoo that visitor numbers would reduce without the parking and that this would result in a serious loss of net visitor income to the Zoo and to Bristol's economy is incorrect.
- The Zoo is a relatively small organisation and tourism is not a major part of Bristol's economic activity.

Other:

- The Zoo should not benefit at the expense of the Downs.
- Suitable brownfield space nearby should be found and used for overflow parking.
- If refused the Zoo will need to take its environmental aims seriously and would be forced to find alternative solutions to parking on the Downs.
- Permission should be granted but with a successive reduction in days per year down to zero, to allow time for other solutions to be developed.
- Parking is harmful to the ecology of the site and landscape of the area.
- Use of the Downs for parking is in conflict with the City's green credentials, having been a European Green Capital.

Comments have been received from a Councillor and organisations objecting to the Zoo's proposal as follows:

Councillor Jude English:

Very bad idea, I wish to enjoy the peace and quiet of the Downs not visit a car park

Bristol Civic Society:

Bristol Civic Society has consistently opposed the use of land off Ladies Mile as an overflow car park for the Zoo. This use is inappropriate in terms of land use policies. It has harmful impacts. It discourages the quest for a long term sustainable solution to the problems raised by visitors to the Zoo arriving by car. In terms of adopted planning policies, the proposal is contrary, in particular, to:

BCS 9 Green Infrastructure

BCS 22 Conservation of the Historic Environment

DM17 Development involving Existing Green Infrastructure.

The site is also located in the Downs Conservation Area which the proposal would neither preserve nor enhance. Although it is not a planning policy, the dedication of the Downs to the people of Bristol as a place of recreation must not be forgotten and the policies outlined above must be used to uphold that purpose.

The proposed extension of the use of this site as an overflow car park would continue to have a number of harmful impacts. Even though the Zoo's Vegetation Survey states that the site could recover from damage caused by the car park, there is indisputable short term wear and tear on the grass in the area used by the car park. The presence of 600 cars on the site spoils the open nature of the Downs and views across them. The cars and the taped boundary surrounding the site are impediments to free roaming and remove the area from recreational use. The taped off area discourages use of the site even when it is not in use for parking.

The daily influx of cars to the Zoo, particularly in the summer, is too much for the road network to absorb without congestion. This spreads into Ladies Mile when that car park is being used. The extension of the time limit for road side parking on the Downs means that the roads on the Downs can also be used to accommodate visitors to the Zoo. Whilst this may have enabled the Zoo to reduce the number of days that it wishes to use the application site, it means that there are less spaces available

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for those who wish to park on the Downs for recreational purposes. This impact is most likely to be felt on public holidays and fine summer days.

The Society feels, therefore, that use of this land for car parking is not solving the problems caused by car trips to the Zoo. It is just spreading them around and deferring a proper solution. Until there are concerted efforts to reduce private car trips, these harmful impacts will continue. We contend that the Zoo will not have the incentive to find a sustainable solution for as long as it can use the Downs as an overflow car park.

In conclusion, the present approach to managing parking for Zoo visitors clearly isn't working:

- It is having a harmful impact on the character and amenity of the Downs;
- It militates against Bristol residents finding parking spaces on the Downs for recreational purposes;
- It is damaging the surface of the area that the Zoo uses for parking;
- It causes congestion;
- It is not even meeting demand for Zoo parking at peak times.

Car parking on the Downs is also not compliant with adopted planning policies. The Zoo must find an alternative, more effective, approach for managing the transport of its visitors that is not harmful to the Downs and does not inhibit their use by people not visiting the Zoo. Bristol Civic Society, therefore, urges the Council to refuse this application so that a more sustainable approach can be developed.

Bristol Civic Society asks that the following policy statements should also be taken into full consideration in the determination of this proposal.

The National Planning Policy Framework paragraph 132 says, "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. The more important the asset, the greater the weight should be."

In the Society's view, the Downs' historic significance is 'high' and the damage caused by long-term car parking is 'substantial'.

The Downs [Conservation Area] Enhancement Statement contains the following enhancement objectives relating to traffic, parking and landscape management:

GENERAL ENHANCEMENT OBJECTIVES

- (1) An environmental traffic management scheme, including provision for cyclists, needs to be prepared in conjunction with the Highway Authority. This should address the issue of over use of the peripheral routes to the Downs and encourage more protected pedestrian and cyclist movement through the spaces.
- (2) As part of the Management Scheme, a study should be prepared investigating the possibility of restricting vehicular use of the principal roads at certain times such as weekends and bank holidays ...
- (4) The Downs Edge and its related gardens is particularly sensitive as it makes a significant contribution to the expansive and sylvan quality of the space. Any car parking which intrudes by being visible from the Downs and its related footpaths will be resisted. In this case, the City Council's Conservation Handbook Principle P33 will be applied.
- (5) Where conversion of large dwellinghouses into flats results in a significant increase in car parking provision and acts detrimentally to the quality of the open landscaping in the Conservation Area, it will be resisted ...
- (8) A landscape management scheme needs to be prepared in conjunction with the

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Leisure Services Directorate to ensure the continuing well maintained open spaces and ensure re-establishment of any trees which have been lost or need replacing.

Clifton and Hotwells Improvement Society (CHIS):

CHIS accepts that Bristol Zoo is of enormous benefit both to Clifton and Bristol as a whole, and it is important that visitor parking facilities are adequate. That said, the Zoo's current ability to use an area of the Downs for this purpose for a limited number of days in the year was never intended to be more than a temporary solution to the problem. A permanent solution **MUST** now be found, and within a specified timescale. This should be a condition of permission being once again granted. Conditions should also be attached requiring the removal of the limestone chippings at one of the entrances, the re-turfing of the entrances immediately at the end of each season and a long-term commitment to returning the car parking area immediately outside the main Zoo entrance to the Downs.

Friends of the Downs and Avon Gorge (FODAG):

I write as chairman of the Friends of the Downs and Avon Gorge to object to this application. Though FODAG understands the problems faced by the zoo at peak times, and accepts that the usage of the site is managed responsibly, it believes that the "temporary" permission to use this site must cease in the foreseeable future. The permission given to the zoo encourages others to park on the grass, as we saw with the gypsy encampment this summer. The use denies the space to the general public at precisely those points in the year when it is most needed. The argument that "the area is little used by the public" is not based on any evidence. The Downs is generally appreciated for its beauty, and mass car parking detracts from this. The track from the car park to the road is an eyesore at all times of the year. The use of the site creates substantial traffic problems at peak times for all normal users both of Ladies Mile, Circular Road, Bridge Valley Road and Upper Belgrave Road. Though short-lived these problems are exacerbated by poor signage, and an absence of any attempt at traffic control to resolve the problems. The Zoo will never take the issue of parking seriously while it always has this site to fall back on. If permission is given it must be on condition that there is a clear deadline for ending use.

Redland and Cotham Amenity Society:

We object to this application for these reasons;

1. Planning policy. The Downs provide an exceptional public green space for the people of Bristol and visitors. This is recognised by National and Local Planning policies and importantly by the 1861 Downs Act. The use of part of the Down's for parking conflicts with national planning policy by damaging a Heritage Asset. It also fails to meet the requirements of the Council's Downs Enhancement Statement.
2. Downs for people. The Society's members are amongst those who regularly use the Downs for exercise, sport and recreation. The intrusion of traffic and parked cars onto open grass areas limits freedom to roam, creates traffic and pollution, particularly at peak times for recreational use.
3. Existing parking. We note that the Zoo already has exclusive use for parking on 0.9 hectare of the Downs in the form of the zoo frontage to Clifton Down. We do not know the financial basis for this use of Council land or the financial terms of the 'temporary' use of the Downs, including the allocation within the Council of any payment.
4. Benefits of Zoo. The cultural, social, educational and economic benefits of the Zoo to Bristol are fully acknowledged. We note that the economic benefits of the Zoo to Bristol are estimated at £18.6m. annually. (There is no breakdown or explanation of this estimate.) £2m. of these £18.6m. economic benefits are attributed to the right to park up to 600 cars on the Downs on 40 days per year. The Zoo's reduction of income if this facility is lost is estimated to be £500,000.

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This implies that the rest of the lost income - £1.5m. - is related to spend elsewhere in Bristol. This does not appear credible. The families that mainly use the Downs parking will have neither the time or inclination to spend any significant money elsewhere in Bristol. It is wrong to use unexplained and significant figures to justify granting of a planning permission.

5. Alternative solutions. There is no firm commitment or timetable for finding ways of reducing or dealing with the number of car borne visitors entering Bristol. For example, additional parking on the large land ownership of the Zoo - the Wild Place site - just off the motorway at Cribbs Causeway, South Gloucestershire, with shuttle bus service to the Zoo.

It is recognised that this or any park and ride system is problematic for families with children at the 'buggy stage' but many car loads do not face this difficulty. In the absence of any alternative plan for the future the public are entitled to believe that the Zoo will continue to maintain that parking on the Downs is essential - not just for the requested 3 years but permanently.

6. Sustainable travel. We note that travelling in a car containing three people is regarded as sustainable. However, where these journeys end with the vehicle parked on green open space in a Conservation Area and on a Heritage Asset we submit that it is unsustainable.

7. Traffic congestion. Recent introduction of controlled parking on Down's roads, with permitted stay increased to 5 hours at the Zoo's request, has added a useful option for zoo visitors. However, it will inevitably lead to extra traffic on Down's roads at all times as visitors try this option, just as they will continue to circulate in the streets of Clifton. The need to close the Downs parking site in wet weather and at short notice amplifies the likelihood of severe traffic congestion.

If despite these representations the council is minded to approve the application then this should be conditional upon the Zoo submitting an alternative parking plan for a site elsewhere within a firm time scale, to be implemented after the 3 years of temporary permission.

Bristol Ramblers:

As Chair of Bristol Ramblers, I am writing to object to Bristol Zoo's application to extend its permission to park on The Downs for another three years. There are two grounds for this objection.

1) Ramblers of which Bristol is the local representative have as their central aim the right of people to enjoy all open space to which they have legal access. The Downs are given to the people of Bristol to enjoy. Parking on The Downs by the Zoo denies people the right to enjoy that open space.

2) Previous applications have been justified on the grounds that they are temporary. The Zoo now claims that there is no practical alternative to parking on The Downs implying that parking thereon is now seen as the permanent solution. Bristol Ramblers objects to this permanent deprivation of people's right to enjoy that portion of The Downs. [At least two comments have been made in support of the application from members of the Ramblers' Association who disagree with the stance taken by Bristol Ramblers.]

Ramblers Avon Area:

In summary:

Zoo visitors' cars occupy one of the best parts of the Downs on many of the best days of the year. The cars have an impact over a much wider area and for a much longer period of time.

The car park and the parts of the Downs nearby are on popular walking routes in an attractive landscape with fine views. Zoo parking adversely affects walking by:

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- (1) blocking key walking routes
- (2) spoiling views over a wide area
- (3) damaging the parking site
- (4) encouraging others to park on the site
- (5) causing congestion
- (6) preventing parking by would-be walkers
- (7) deterring walkers all day, every day, at the best times of the year.

Walking on the Downs is in theory fully protected by rights, laws and policies. The Downs are common land where people have had a right to walk for many centuries. National and local policies are intended to protect green spaces and promote walking.

Bristol Zoo is much loved by many people and is a valuable amenity. That cannot justify parking on the Downs in perpetuity, spoiling the enjoyment of many more people and contrary to national and local planning policies. The Zoo has used the Downs for parking for nearly 50 years and has no plans to stop. *Planning permission must be refused and the Zoo must make proper parking and other travel provision for its visitors.*

The Zoo and the Downs should be complementary, not competing, attractions. We would like many more people to walk over the Downs to visit the Zoo. We would like Zoo visitors encouraged to explore the Downs on foot. We want the Downs freed from Zoo traffic so that everyone can enjoy them.

The full text of the letter from the Ramblers Avon Area is appended to this report.

Brunel Walking Group:

The Brunel Walking Group, part of the Ramblers, believe in the right of people, of all ages, to enjoy all open space to which they have legal access in both town and country. The Downs are there for everyone in Bristol to enjoy and we believe that this right will continue to be hindered by the Zoo's planning application to continue to park on a portion of the Downs.

The Brunel Walking Group does not agree that there is no practical alternative to parking on the Downs. The Zoo should find a long-term solution that is beneficial to the whole community in Bristol; that reduces traffic and pollution in the City; and does not hinder people's access to the Downs. The Zoo will have no incentive to do this if granted another planning permission.

Bristol Nordic Walking:

We use and love the Downs and lead walks over the whole area every day. We have read the Downs for People reasons for objecting the above application by the zoo and we fully support their grounds for this objection. We hope the Downs can be kept for the use it was intended and not bow to commercial pressures.

Open Space Society:

In Summary:

Reasons for the objections have changed little in essence since 1997 (the first application).

- The Downs are a magnificent open space; parking for up to 660 cars on the finest days of the year significantly interferes with people's enjoyment. People should be able to walk, picnic and play in a car-free environment.
- The Downs should be fully protected by national and local planning policies. Previous planning

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committees have been in no doubt that parking was fundamentally unacceptable.

- Previous travel plans prepared by the Zoo have been ineffective.
- Since 2013 the Zoo has attracted more cars by acquiring more free parking on the roads on the Downs and encouraged parking by offering bargain admission throughout August 2015.
- The Zoo is lobbying for support on the basis that families have to be able to drive to the Zoo and that there are no practical alternatives. The Zoo is also proposing to reduce the number of days it used Ladies Mile to 30 days in 2019. Without any action proposed to reduce car travel to the Zoo the current problems will continue and worsen on peak days.
- The Zoo will not make appropriate arrangements for its visitors until planning permission is refused.

The full text of the letter from the Open Spaces Society is appended to this report.

Conservation Advisory Panel (CAP):

This wonderful green area was saved by Bristol campaigners and endorsed by the Downs Act of 1861. The story is set out beautifully in a display on the Stoke Road side of the Water Tower.

The fact that the Downs Committee has allowed the Zoo to use a section off Ladies Mile as a car park for many years is no justification for its extension. This decision, which favours private motorists, is an example of the indifference of Bristol councillors and the Merchant Venturers to the needs of the electorate.

Recent campaigns to protect our open spaces were covered by the Evening Post in 2011 and 2012. An indication of how passionate people are to protect their own local area was covered in an issue in 2010 with the heading "The big sell off broken down area by area". The Evening Post heading on 9 March 2011 was "7,000 people say think again"

Access to nature, water, sustainability and breathable air are key issues.

Apparently Bristol has not fared well in compensation from developers. We are now on the global map thanks to George Ferguson. In a book published in 2013 titled "If Mayors ruled the world" by Benjamin R Barber, the author states that George Ferguson has "made an impression around Europe, has made Bristol the 'European Green Capital 2015', and is active in the global mayors' parliament project as well."

Hopefully Mayor Marvin Rees and local councillors will protect the Downs and all our open spaces in 2017 and celebrate how they were won.

Downs for People:

Downs for People (DfP) is an informal organisation set up in 2013 to co-ordinate objections to the zoo parking on the Downs. It has a core of very active members and others who keep in touch and contribute their expertise when needed. Most members have relevant professional qualifications and/or experience of environmental issues.

DfP have submitted a number of detailed objections focussing on specific aspects of the proposal. Their initial statement states as follows:

"I am writing on behalf of Downs for People to register our objection to the Zoo's latest application to use land off Ladies Mile as a car park. This statement sets out our initial reactions to the application.

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Reasons for objection:

In summary, our concerns remain what they have always been:

- (1) the Downs were given to the people of Bristol as a place for recreation. They are a priceless asset intended to be fully protected by the Downs Act and numerous local planning and transport policies;
- (2) use of the Downs as a car park for an attraction elsewhere is contrary to these policies;
- (3) the car park and associated traffic movements spoil people's enjoyment of the Downs on the best days of the year;
- (4) when the car park is full or cannot be used because the ground is damp, there is traffic chaos.

At first sight the current application is encouraging because the Zoo is seeking permission for a reduced number of days, from 40 in 2017 to 30 in 2019. But it is not planning to do anything significant to achieve this reduction - indeed the Zoo has rejected further options, this time put forward by the City Council's highway officer, and describes Park and Ride obligations attached to its last permission as 'unreasonable'. The City Council extended proposed parking hours on the roads on the Downs to suit Zoo visitors and this will have contributed to the Zoo's ability to manage with about forty days this year. A reduction to thirty days is likely to mean visitors to the Downs will be unable to find parking on the roads there on more days and there will be more traffic chaos.

The Zoo's case

The Zoo claims that:

- (1) both it and the city will suffer significant financial losses if parking on the Downs ends. It made similar claims at the time of its last application [2013] without providing evidence. The planning committee was therefore advised to give them only limited weight. We have asked the Zoo for the basis of its current claims.
- (2) parking on the Downs promotes sustainable travel because car occupancy rates are high. This claim can - and will - be challenged.

In any event, this application is about the use of a public open space where parking has demonstrably harmful impacts, as set out above. The Zoo needs to show that the public benefits from parking outweigh these harmful impacts, not just that parking on the Downs is the cheapest and most convenient option for the Zoo and its customers. The Zoo has not convinced past planning committees that there are public benefits: they have reluctantly given six temporary permissions for parking on the basis that it will be brought to a speedy end.

Conclusions

Fifty years of allowing the Zoo to park 'temporarily' have produced problems, not solutions. Temporary permissions for using the Downs for parking must cease and this application must be refused. Only then will the Zoo have an incentive to make arrangements for its visitors which will not impinge on residents' enjoyment of the Downs and which address the traffic problems round the Zoo. The Zoo needs to make proper parking and other transport arrangements for its visitors. No doubt it will do so if permission is refused."

Downs for People has submitted three further submissions which are summarised below:

Transport and Travel Issues:

"Summary:

Transport and travel issues are why the zoo has been given six temporary permissions to park on the Downs in contravention of development plan policies. Permissions were given on the basis that the

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zoo would bring parking to a speedy end. ***Now that the zoo is offering no prospect of this, permission should be refused.***

This analysis looks at past and potential action on travel to the zoo. It proposes a way forward and examines the consequences of refusing permission. The annex contains a summary of relevant transport policies.

The analysis shows:

- **travel plans and surveys.** The council has required the zoo to produce travel plans and surveys for almost twenty years. This has given the illusion of activity but achieved nothing: 80% of visitors came by car in 1998, 91% in 2009, and 80% in 2016. Distances travelled have risen so that vehicle miles have increased. ***The latest travel plan makes it clear the zoo intends to park on the site indefinitely, while surveys show visitors would be happy to use alternatives.***
- **past action by the zoo and others.** The zoo has done little to provide parking or transport for its visitors. Experts have been unimpressed. In contrast, the Downs Committee has provided 180 permanent and 660 temporary parking spaces at extraordinarily low rates. Bristol City Council has provided 330 metered spaces on roads round the zoo and 1500 free spaces on roads on the Downs. The council and public transport operators have subsidised bus and train services to the zoo.
- **options:**
 - o **park-and-ride.** The zoo's actions have been token gestures, made grudgingly. The services provided have been unattractive and poorly advertised. The only park-and-ride now is a public bus on the little-used Long Ashton route. The zoo's offer to provide £3 off entry and more promotion is derisory. There is much more potential – a Portway service could accommodate 63% of visitors on peak days and 54% of visitors would consider using park-and-ride.
 - o **alternative car parks.** Development of the zoo's West car park is the obvious solution to the provision of parking for those visitors for whom park-and-ride, public transport, walking and cycling are not feasible options. A well-designed, substantial car park would remove the need not only for the use of Ladies Mile but also for the zoo's North car park for some of the year.
 - o **public transport, walking and cycling.** The zoo has done little to encourage these alternatives and plans to do no more. Its attitude is unnecessarily defeatist. Visitor surveys have shown that more visitors would take advantage of the existing incentives if they knew about them and additional incentives would attract more people. On peak days the zoo could run special bus services, as other events do.
 - o **charging more for admission and parking.** The zoo needs to vary its admission charges so that it does not attract more visitors in cars than can be easily accommodated. The zoo's parking charges are absurdly low compared with those elsewhere in the city. Parking charges need to be set high enough to provide an incentive to use other means of travel and to prevent people parking at the zoo to go elsewhere. As with admission, differential charges could be used to deter visitors at peak times and to attract them when there are spaces in the zoo's car parks.
 - o **publicity.** The zoo is skilled in the use of its web-site and social media. It could use these more effectively to attract visitors coming by alternative means of transport. It could deter visitors from driving by making it clear parking was not available.

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- o **a combined approach.** A combination of the measures above (or similar) could not only eliminate the need for the Ladies Mile site but also reduce parking by zoo visitors' cars on the Downs.
- **consequences of refusal.** There should not be any traffic problems if the zoo publicises the lack of parking and the alternatives effectively. If it does not, any problems are likely to be short-lived. The council has powers to prevent excessive use of on-road parking.
- **planning and transport policies.** National and local planning and transport policies do not support the zoo's claim that shared car use should be encouraged. There are firm commitments to reducing car use nationally and locally.

This cannot go on. Planning law requires applications to be determined in accordance with the development plan. Parking on the Ladies Mile site contravenes the development plan and many other policies. The zoo attracts about 126,000 cars a year, well over 1000 on a peak day. ***Planning permission must be refused. Only then will the zoo act to attract only the number of visitors that can be accommodated without causing traffic chaos and intruding on the local environment.***

Financial and Economic Issues

"Summary:

1. Planning is concerned with ensuring land is used in the public interest, not with protecting the private interests of applicants. Planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. The use of the Downs as a car park is contrary to the development plan. Temporary permissions have been granted in the past on traffic grounds. The financial impact on the zoo and the city have not been considered significant material considerations.
2. The zoo has made financial and economic claims which are not soundly based:
 - **£500k loss in zoo income from loss of the Downs car park.** This takes no account (para 4.2 below) of: non-paying visitors; that most users of the car park would still come; and that there are attractive alternatives. ***The losses would be about £100k (para 4.3) if the zoo offered no alternatives.***
 - **£2 million loss to the city from loss of car park.** This is based (para 5.4) on miss-using a figure for the average spend on a ***visit*** to Bristol as spend ***per visitor***. The figure should not be applied to individual attractions anyway. In practice, most zoo visitors will still come; not all will pay for admission; and hardly any zoo visitors spend money elsewhere in Bristol (paras 5.6 to 5.12). ***The impact on the city would be negligible.***
 - **the zoo is Bristol's most popular visitor attraction.** Not according to surveys (paras 6.3 and 6.4). The zoo *can* claim to be Bristol's single 'biggest paid for destination'. Many more people visit the Harbourside attractions collectively.
 - **zoo visitors benefit the local economy by over £18.6 million a year, more than £51k a day.** It is not clear how these figures have been calculated (para 6.5). They are probably based, like the £2million figure, on the mis-application of a figure ***per visit*** as a figure ***per visitor***. Most zoo visitors do not spend money elsewhere in Bristol. ***The zoo's contribution to the local economy is the portion of its £6.6million expenditure that is spent in Bristol.***
 - **there are additional benefits from employing staff and buying goods and services locally.** No, there are not. ***These are included in the zoo's £6.6 million expenditure on the zoo. Loss of income from the Downs car park would anyway not significantly affect the zoo's employment or spending levels.***
 - **the zoo is hugely important to the city's tourist economy.** With 200 staff compared to 109,000 jobs in the city centre, the Zoological Society is a minor player economically (para 6.9). The city's planning policies for tourism focus on locally-based activities which reduce the need to travel and on regionally -important facilities in the city centre (paras 6.10 and 6.11).

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Tourism generally and the zoo in particular are not a huge part of Bristol's economy. Encouraging people to drive long distances – as the zoo does - is contrary to the city's planning policies for tourism.

- **the Zoological Society relies on public support to fund conservation and research projects worldwide.** Not a material planning consideration. In any case, the society spends only a modest amount on these projects, most of it funded from 'restricted funds', not admission charges (para 7.3). ***The zoo seems unlikely to reduce this work.***

3. The zoo's claims are inaccurate and irrelevant. It has exaggerated both the importance of the Downs parking and the zoo's importance to the city. The zoo's finances are healthy: the loss of Downs parking would pose no threat to the viability of this much-loved visitor attraction and local amenity.

The financial and economic issues raised by the zoo in its application and public lobbying should not be considered material considerations when determining the application.

The Impact on the Downs:

"Summary:

This analysis looks at the impact of zoo parking on the Downs. It considers how far parking is compatible with Bristol's development plan and other policies. This is critical because planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The analysis shows that the car park occupies a particularly attractive area of grassland, of great value for recreation and of conservation interest. Parking has an adverse effect on recreation, both on the site itself and over a wider area. Cars are visually intrusive, noisy and dangerous. Parking on the site has reduced its nature conservation interest, with bare earth, vehicle tracks and a decline in the quality of the grassland. The zoo ignores the environmental protocol agreed with the Council when it suits it to do so.

The Downs are protected by four planning designations: Important Open Space; Site of Nature Conservation Interest; Local Historic Park and Garden; and Conservation Area. There are development plan policies covering all these designations. Parking on the Downs is in clear contravention of them.

Parking on the Downs is also contrary to planning policies on walking and recreation and to numerous national and local policies on related issues.

Zoo parking on the Downs is clearly not in accordance with the development plan. It never has been six planning committees have given temporary permissions only because they considered transport and travel issues a sufficient material consideration. We showed in a previous analysis that this is no longer the case. ***Planning permission should be refused.***

The full text of all the Downs for People submissions are appended to this report. The Zoo was invited to comment on the detailed DfP submissions and did so. This in turn generated further responses from DfP and the Zoo. Full copies of all the subsequent submissions received are also appended to this report."

OTHER COMMENTS:

Transport Development Management:

This area of The Downs has been used for many years as an overflow car park for Bristol Zoo Gardens (BZG) on busy days. This is to address parking demand when the permanent zoo car parks become full during peak periods. The Downs alternative parking provides parking facilities a convenient walking distance

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from the zoo and in so doing reduces the pressure for on-street parking and congestion in the residential roads in the immediate vicinity of the zoo. However, this arrangement has always been temporary, and through the planning process requires to be reviewed every 3 years.

TDM recognises that such an arrangement does very little to encourage travel by sustainable modes, given the convenience of parking close to the zoo and the relatively modest cost of doing so (£3 per vehicle) when compared to the equivalent cost and time associated with travelling by public transport to and from the large catchment area from which BZG attracts visitors. The travel decisions BZG visitors make is further influenced by the nature of visitors to the zoo. Typically, visitors to the zoo arrive in a group, with submitted data indicating an average vehicle occupancy of between 3 and 4 persons per car.

Transport officers have therefore been in dialogue with BZG for a number of months in the pursuit of formulating effective and deliverable alternatives to private car use to access the zoo as part of its Staff and Visitor Travel Plans. This has been informed by travel plan surveys and other data collected over the three years since the previous application to extend the temporary consent.

Catchment

Before any assumptions and suggestions can be made about alternative modes of transport, it is first necessary to understand the catchment areas from which the zoo attracts visitors. These are illustrated below and are based upon postcode data taken from BZG's travel surveys and then assigned to a principal route. An average has been assumed across the three years of study in order to take account of any anomalies. As such, this is the best assessment TDM has of where BZG's customer base.

Route	Catchment	2013	2015	2016	Average
M49 N	South Wales	16%	23%	26%	22%
M5 N	Glos, Cheltenham	14%	12%	11%	12%
M4 E	Wiltshire, Swindon, Berkshire, Oxon.	14%	6%	13%	11%
A4 / A431 SE	Bath, Keynsham, NE Somerset	9%	5%	2%	5%
A37 S	NE Somerset, Wells, Glastonbury	4%	3%	3%	3%
A38 S	North Somerset	2%	2%	2%	2%
A370 S	Nailsea, WsM	2%	2%	2%	2%
M5 S	Clevedon, WsM, Somerset, Devon	7%	13%	19%	13%
Bristol Urban Area (internal)		32%	35%	23%	30%
TOTAL		100 %	100 %	100 %	

From the above table, it can be seen that 58% of BZG visitors approach Bristol from the motorway network (M49, M5 and M4), whilst a further 30% arrive from within Bristol itself.

Park and Ride (P&R) Provision

The quantum of BZG visitors travelling into Bristol from the motorway network would suggest that were a Park and Ride service to be operated from a specific location that was easily accessible to the motorway network, a successful service could potentially have the effect of minimising parking demand in and around the BZG site, and in so doing reduce the reliance on the overspill car park.

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For such a service to be attractive to visitors the services would need to be competitively priced (i.e. cheaper than current car parking) in order to realise a modal shift away from private car use. Following renewal of the temporary consent in 2013, Transport officers therefore required a service to be put in place that met the above criteria.

2014 Park and Ride Service

In 2014 BZG operated a free Park and Ride service between the Portway Park and Ride and BZG during: the summer school holidays; May half term, the August Bank Holiday and Sundays proceeding bank holidays to coincide with peak periods of demand. This service was operated by two 16-seater wheelchair-accessible minibuses that included child seats. The services operated on demand and were advertised on the BZG website.

However, average occupancy was below 25% (4 passengers on each bus) and therefore, when compared to the average car occupancy for visitors to the zoo at that time (3.61 occupants), offered little advantage in terms of reducing traffic, although it was acknowledged that this did however remove a vehicle that would need to be parked around the zoo, potentially from the overspill car park.

Upon reviewing the above situation, transport officers concurred with BZG that the above service and its outcomes were ineffective and required to be addressed in time for summer 2015.

2015 and 2016 Park and Ride Services

During 2015 and up until September 2016, the 901 Park and Ride Service operated from Portway to Clifton and served the zoo via the existing stops on Clifton Down. The service ran from Monday-Saturday. It was therefore agreed that rather than providing a bespoke service, BZG would subsidise the 901 route to enable the service to run on Sundays and Bank Holidays over the summer period to meet the gaps in the existing service that coincided with the zoo's periods of peak demand.

This route was registered to coincide with the rollout of the Clifton Residents' Parking Scheme (RPS). However, it generated very little patronage on weekdays as well as in connection with the zoo and therefore the service was discontinued. Consequently, the zoo have confirmed to BCC that to re-run a bespoke park and ride service would once again be financially unviable and are therefore unwilling to enter into such a commitment.

Park and Ride

Transport officers have therefore pursued BZG once more in order to take seriously its commitment to sustainable travel and the reduction of parking on the Downs. This would require a multi-angle approach to operate and/or fund more convenient alternatives and financially incentivise alternatives that will influence to visitors in such a way as to better compete with the comparatively easier method of driving to the zoo and parking (for a relatively small fee) on The Downs. For such intervention to be effective, Transport Officers required the following:

- 1) to re-assess the potential for Park and Ride services to the site that
 - a) clearly advertise such services on BZG's website and in local media;
 - b) offers more competitive financial incentives for the use of Park and Ride (i.e. a discounted entry to the zoo), and
 - c) for the Park and Ride to be clearly signed from the motorway network to encourage its use

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Subject to the above interventions being fulfilled, officers could subsequently argue that BZG would be doing all it possibly could to reduce the impact of parking and traffic on the surrounding highway network.

Further sustainable transport measures

In addition to the above, Transport officers requested the following further travel planning interventions:

- 2) admission discounts for BZG visitors (including members) travelling by sustainable modes
- 3) better marketing of sustainable transport options / media campaigns etc.
- 4) the installation of real-time information screens within the gift shop and café
- 5) Upgraded bus stop infrastructure in the vicinity of the site
- 6) Higher charges for car parking, including for BZG members
- 7) A review and revision of the staff permit parking system
- 8) A reduction in the number of Downs spaces from 600 to reflect the impact of travel plan measures and targets

BZG response to Park and Ride and further sustainable transport measures

Over the course of the winter / spring of 2016/17, BZG have considered the above requirements and what alternative options could be provided to reduce the need for parking on The Downs.

1) Park and Ride

BZG has undertaken an assessment of the cost and relative benefits of running a bespoke Park and Ride bus service from Portway Park and Ride site to the BZG site. It concludes that such a service would be unviable for the following reasons:

“Costs with no Bus Service Already in Place

As of September 2016 BCC removed the P&R service from Portway to Clifton. Based on passenger data provided by BCC it is assumed that the removal was due to lack of patronage, and thus the service was not viable.

Therefore to provide a private P&R service to BZG it needs to be considered if new buses are required, or if local operators have available buses during the peak periods considered. Weekday/weekend costs may also differ as a result of bus availability.

Current public transport contribution requirements for other developments PEP are involved in has indicated that the cost of the provision of one bus is around £180,000 a year. Assuming the cost can be proportioned to the number of days required the following costs would be incurred:

- *two buses to provide a 30 minute service to BZG for the peak 72 days = **£71,014***
- *three buses to provide a 15 minute service to BZG for the peak 72 days = **£106,520***

In practice it is unlikely that the cost of a service for part of a year will be able to be a direct proportion of an annual service as part of the cost is sourcing the buses, and this would be the same no matter how many days the service operated.

The cost of the P&R provision is not a viable option for BZG. However it is also determined that the patronage would also not be significant and the service suggested above would have limitations. Matters for further consideration include:

- **Capacity of vehicle.** *A standard single deck bus has a capacity for around 70 passengers. Therefore with a 30 minute frequency, assuming all buses to BZG were full up to 14.00 this equates*

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to P&R provision for 770 visitors on 11 buses.

• **Capacity of Ladies Mile.** *Up to 600 vehicles are able to be parked on the area at Ladies Mile. Car occupancy in recent years has been between 3.3-3.9, 1940 to 2340 customers. This equates to the requirement for around 28-33 full P&R buses to transport visitors to BZG. Even with a 15 minute frequency these customers would not be accommodated on P&R services.*

• **Pushchair Provision.** *Standard single deck buses typically have space for up to two to three pushchairs at one time. During the busier arrival period between 10.00 and 13.00 requirement for more pushchair spaces than provided may be sought as BZG guests often have at least one pushchair per group. Greater number of pushchair spaces could be provided which in turn would reduce passenger capacity.*

• **Frequency.** *As customers arrive and depart gradually many customers would have to wait with a 30 minute service frequency. Visitors will not want to have to wait for 30 minutes if they have just missed a bus.*

• **Operational Time Period.** *Customers arrive and depart gradually therefore a P&R service needs to be operational all day to allow access to BZG and back to their vehicles at all times. Unlike an event at an arena when distinct start/finish times are known.*

• **Number of Buses Required.** *In order to achieve a 15 minute bus service and the appropriate dwell times at either end of the service four buses may be sought. This would increase cost further. Four buses equates to a cost of £142,027 per season.*

Further discussions with BZG confirms the position that it is not willing to enter into such an arrangement to provide a Park and Ride service, nor would it be possible for BZG to absorb such costs for a limited benefit in terms of reductions in car trips to the site. Furthermore, the cost associated with installing additional signage along the M5 and M4 motorways to direct visitors to the Park and Ride results in significant additional costs of between £40,000 and £60,000 per new sign at up to four locations which again BZG is unwilling to meet.

It has been previously suggested that the 'carrot' of offering an incentive-based Park and Ride service alongside the 'stick' of discontinuing the Downs car parking completely would effectively force more visitors onto the Park and Ride Service. However, this is also an arrangement that BZG is not prepared to enter due to the potential this would have for further discouraging visitors to travel to the site.

2) Admission discounts for travel by sustainable modes

At the request of Transport officers, BZG now offers its visitors a discount of 33% off their admission fee for travelling to the site by bike, bus, via the Long Ashton Park and Ride service, or by a non-First Great Western (FGW) rail service, whilst an existing offer has been retained that awards 2 for 1 entry for those that have travelled by a FGW rail service. Transport officers had originally sought a 2 for 1 entry on all sustainable modes of transport. However, this was rejected by BZG on the grounds of viability, regardless of whether such a promotion may increase visitor numbers.

The above schemes will be reviewed in the autumn of 2017 to evaluate their success.

3) Marketing and Promotion

At the request of Transport officers, the zoo has revised its website to make more prominent the incentives for sustainable travel to the site. Transport officers are content that the website content is now more accessible and prominent on the website homepage, and again will review this in the context of the BZG visitor travel surveys in the autumn of 2017.

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4) Real Time Passenger Information (RTPI)

At the request of Transport officers, BZG has recently installed TV screens in the gift shop that provide continuous real-time information confirming the arrival and departure times of bus services using the stops on Clifton Down. This has been possible via a direct link to the TravelWest website. Officers have further requested that such screens are also placed within the new café/restaurant but it is not known at the time of writing whether these have been installed.

5) Bus stop infrastructure

At present there are two bus stops (one on each side of Clifton Down) in the direct vicinity of the zoo entrance. The northbound stop is accessible via a controlled pedestrian crossing. Both stops benefit from real time information, however they are of a now-discontinued two-bay specification and often struggle to accommodate / shelter the number of passengers waiting to board services at peak times. This is particularly problematic on days where weather is unsettled and shelter is required.

Transport officers requested that BZG fund upgrades to these shelters and stops in order to provide expanded and more up-to-date facilities to better cope with demand whilst improving the experience of the public transport user. BZG have considered such a contribution of just under £107,000 to upgrade these stops but have considered this unnecessary, as:

- *visitors to BZG typically leave BZG to wait for a bus shortly before services are due to arrive;*
- *the new RTPI screens in the gift shop at BZG enable visitors to wait within the gift shop rather than on street; and*
- *the bus stop, and approaching bus is visible from the gift shop.*

Whilst it is reasonable to expect those within the site to take their cue from the RTPI within the shop, it is inevitable that, on occasion passengers will get caught in the rain whilst waiting for a bus given the length of queues that are witnessed on busy days. Transport officers therefore require this to be reviewed and reconsidered at a later date should the travel plan fail to achieve a satisfactory reduction in visitor car reliance resulting from the measures referred to above.

Additional Measures

The revised Travel Plan refers to the following further sustainable travel measures:

- social media used to encourage travel by alternative means of transport and to promote Park and Ride use on busy days;
- travel information promoted in the members e-letters;
- Bristol City Council Travel Roadshow team to visit BZG
- 20% off with National Express ticket;
- 33% off with tourist bus 'hop on hop off' ticket
- £5 off membership renewal by collecting 5 cycle or bus user stamps throughout the year.

A *Summary Action Plan* is included within the April 2017 version of the Travel Plan as appended to this report which provides further detail on the measures BZG will be adopting throughout 2017 for staff, visitors, students and corporate visitors.

Members will note that within the Travel Plan, section 7 refers to ongoing monitoring in conjunction with

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BCC's Travel Plan officers – this process will continue and seek to make amendments and improvements to the Travel Plan as a living / evolving document in order to achieve the targets that are set out in section 6.

Ecological Officer:

This proposal is directly on a Site of Nature Conservation Interest (SNCI), Clifton and Durdham Downs, which has botanical interest for its grassland. Accordingly Policy DM19 in the Local Plan applies. The most recent submitted vegetation monitoring report for 2016 indicates that 'there is no evidence of any ongoing decline in the diversity of plants of unimproved grassland in the car parking area, and in recent years some evidence in an increase, and that there is no evidence of any ongoing increase in the diversity of plants indicative of disturbed conditions in the car parking area.' No objection subject to all activities being carried out in strict accordance with the recommendations in the mitigation section of the submitted vegetation report dated 2016.

Archaeological Officer:

The contour survey work required by condition on the 2013 planning permission has not been carried out and should be added if the application is approved. This is required to record the current surface and then used to assess any potential damage that may have occurred after the car parking use has ceased for this year. We would then be in a better position in future to consider the possible damage that car parking may cause.

Air Quality:

The air quality impacts from the proposals for continued but reduced capacity for parking on the Downs is difficult to quantify but it is my professional judgement that they are likely to be negligible, when compared to the existing baseline where parking is permitted.

In order to assess the air quality impacts you'd have to balance the reduced capacity and possible reduction in trip demand generation, with people being encouraged to use other modes of transport, with any potential increase in congestion and vehicles circulating over a relatively wide area of the city looking for places to park, if this indeed were to happen.

With regards to air pollution when looking at these proposals, the direction of movement, with a continued reduction in parking capacity is the right direction. Even if the changes were to lead to a short-term increase in vehicles circulating the area looking for places to park, the long term impacts of parking reduction or a situation where no parking is allowed on the Downs is likely to be positive and encourage the required modal shift in the way people get to the Zoo.

RELEVANT POLICIES

National Planning Policy Framework – March 2012

Bristol Local Plan, Adopted December 1997

B15	Streets and Open Space
B22	Sites of Archaeological Significance
NE1	Open Space
NE5	Sites of Nature Conservation Interest
NE6	The Wildlife Network
NE9	Historic Landscapes
L1	Open Space: Protection of Playing Fields and Recreation Grounds
L11	Tourism: Leisure Development
M1	Transport Development Control Criteria

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B2 Local Context

Bristol Development Framework Core Strategy – June 2011

BCS10	Transport and Access Improvements
BCS13	Climate Change
BCS8	Delivering a Thriving Economy
BCS9	Green Infrastructure
BCS22	Conservation and the Historic Environment
BCS23	Pollution

Bristol Development Framework Site Allocations and Development Management DPD

DM16	Open space for recreation
DM1	Presumption in favour of sustainable development
DM14	The health impacts of development
DM17	Development involving existing green infrastructure
DM19	Development and nature conservation
DM23	Transport development management
DM31	Heritage assets
DM33	Pollution control, air quality and water quality
DM35	Noise mitigation

KEY ISSUES

(A) IS THE PROPOSAL ACCEPTABLE IN LAND-USE TERMS?

The site is designated as an Important Open Space, an Historic Landscape and a Site of Nature Conservation Interest (SNCI) as shown on the Policies Map of the adopted Bristol Local Plan 'Site Allocations and Development Management Policies' (July 2014). The site also falls within the Downs Conservation Area. In land use terms, the key issue to be addressed is whether the use of the site as a car park will cause harm to this sensitive environment.

Part II (Conserving and enhancing the Natural Environment) of the National Planning Policy Framework (NPPF), outlines that the planning system should contribute and enhance the natural and local environment by protecting and enhancing valued landscapes.

In addition, the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset [such as a conservation area], great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.

The NPPF adds that where a proposed development will lead to substantial harm to 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.

Policy BCS9 of the Bristol Local Plan Core Strategy again concerns 'Green Infrastructure'. This policy aims to protect, provide, enhance and expand the green infrastructure assets which contribute to the quality of life within and around Bristol. The Policy specifies that 'the integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced.' With regard to 'open space' the policy states that 'open spaces which are important for recreation, leisure and community use, townscape and landscape quality and visual amenity will be protected.' The policy also refers to biological and geological conservation specifying that 'national and local sites of biological and geological conservation importance will be protected having regard to the hierarchy of designations and the potential for appropriate mitigation.

Policy DM17 of the Bristol Local Plan, Site Allocations and Development Management Policies relates

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to 'Development Involving Existing Green Infrastructure'. This includes a section on 'important open spaces' and states 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.' The Downs are designated as an Important Open Space on the Policies Map. The policy defines such spaces as having a role and value for recreation, leisure, community use, townscape, landscape or visual amenity quality and states that they are protected from development.

The character of The Downs is one of an expansive plateau of open parkland, of which the site is an important section. The part of the Downs concerned is significantly enclosed by mature trees and vegetation, which partially screens it from the surroundings. The southern part of the Downs (South of Stoke Road) is slightly undulating, meadow in character and dotted with trees, low level scrub and vegetation. The site, like many areas within the southern part of The Downs, is located away from surrounding main roads and is relatively quiet and peaceful. Several objectors have commented that the site is one of the best parts of the Downs and is in contrast to the open grassland which forms most of the Downs.

It is clearly recognized that the Downs is of high value in terms of leisure and recreation interest and has high visual amenity quality and that the permanent use of any part for car parking would be unacceptable. The proposals are contrary to the well- established Development Plan policies and as such on purely on land – use grounds, the proposed use cannot be supported on a permanent basis. In order to support this proposal, other material considerations would have to exist that outweigh this non-compliance with policy.

(B) DO THE PROPOSALS SATISFACTORILY ADDRESS ACCESS AND MOVEMENT ISSUES?

In the last three years the number of days the overflow car park at Ladies Mile has been used was 2014 – 38; 2015 – 38 and 2016 – 41 days.

In terms of highway safety issues Transport Development Management has advised in response to this and previous planning applications for this site that this level of use does not pose any road safety issues provided it is operated in accordance with the parking protocol. It has been advised that if the site was not available for overflow parking on peak days that this would have a major impact on the surrounding area.

In order to reduce any such impact it is clear that over time there has to be a modal shift away from visitor car travel. The previous application (13/01140/X) was approved subject to the following main sustainable transport measures, secured by 106 Agreement:

The implementation of a Park and Ride service between the Portway Park and Ride site and the Zoo,
 The preparation, implementation and monitoring of Staff, Visitor and Corporate Visitor Travel Plans

This followed on from a previous planning application in 2009 (09/05111/T) which contained similar measures to operate a park and ride service from the Portway.

The operation of a park and ride service has always been considered to have the best potential to achieve a modal shift away from car travel to the Zoo to reduce the dependence of the Zoo on the Ladies Mile site for overflow parking. It has also been recognized that this would have to be part of a package of measures to achieve the long term aim of eliminating the need for parking on the site.

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Park and Ride:

A summary of the recent operation of the park and ride service from the Portway to the Zoo is set out in the comments from Transport Development Management (TDM) earlier in this report. Unfortunately, occupancy rates achieved have consistently been below 25%. One of the key factors behind this low occupancy rate is that the potential success of a park and ride service is very dependent on visitor choice. In particular, many of the Zoo's visitors tend to be families with young children and associated children's paraphernalia and, as expected, the vast majority of the Zoo's visitors prefer to travel by car and park as close as possible to the Zoo. This is evidenced by the many hundreds of comments received in support of the application. In one sense this transport choice is sustainable given the high occupancy levels of visitors' vehicles at more than three occupants per car, however the long term objective to reduce the number of car journeys being made to the site remains largely unaltered.

Comments from Downs for People and other third parties/amenity groups have been received that the Zoo should be making more efforts to promote, operate and expand a park and ride service and be actively dissuading visitors from arriving by car. Objectors have stated that Bristol Zoo could also run a park and ride service from the Zoo's own site at Cribbs Causeway ('Wild Place' which includes the Hollywood Tower estate and Mansion House) in addition to the Portway. Other options suggested – which were also raised at the time of the 2013 application – include the use of a shuttle bus service from land at Cribbs Causeway, the possibility of developing a multi storey car park on the Bristol Zoo West site or the purchase of other sites close to the Zoo for car parking.

As stated in the TDM comments above, there have been discussions with the applicant to again consider running a Park and Ride service from the Portway. The Zoo have made clear that they would not consider closing the Ladies Mile site on the days when the Park and Ride was operating, thereby eliminating the main 'stick' that could be used to encourage higher occupancy rates. With the site remaining available for parking, the P&R service would have to operate so that the cost would be minimal to incentivize its use. On this basis a financial breakdown was provided on request which is detailed in the TDM comments above. Depending on the frequency of the bus service provided, this shows that funding a new Park and Ride service would cost between £71,000 and £142,000 per year.

Addressing the viability of running such a service, the Zoo's transport consultants have commented as follows:

BZG have confirmed that the cost of between £71,000 and £142,027 per season for a P&R service is not viable.

BZG have identified that they need to retain a surplus in funds to sustain, develop and protect the organisation. The surplus for 2017 is £157,000. This gives a buffer to manage risk around unexpected expenditure, such as:

- Increase in utility costs (this has already resulted in a reduction in the surplus of £25k below that set out above);
- Undertake major repairs to exhibits;
- One off changes to exhibits as a result of animal welfare;
- Reductions in guest income (eg avian flu outbreak economic downturn)

BZG are also obliged under charities legislation to:

- Extend resources in compliance with BZG's charitable objectives - making a significant donation to a local council is therefore ultra vires for BZG;

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- Make evidence based decisions on how money is spent and who benefits from it consistent with BZG purpose

The consultants also made a comparison with other development proposals, stating that if the proposal was a typical residential or commercial development, then the developer would still be permitted to make a profit of around 20%. If contributions sought by the local planning authority resulted in this not being able to occur then the contribution request would be deemed to make the proposal unviable.

A final point made is that BZG is a charitable organisation. The proposals currently under consideration are for the temporary use of Ladies Mile for parking for up to 40 days a year. This is not an extension to the BZG site, nor would there be an increase in the number of visitors as a result of this application. Therefore the request to fund public transport and infrastructure should be considered on this basis.

With regard to the use of the BZG's 'Wild Place' at Cribbs Causeway, the applicant states that "This has been explored and found to have little traction. Whilst covering a larger area than the Zoo, there is limited parking capacity on the site, making it wholly incapable of providing such a service. Furthermore, the Wild Place car park is also full on the same peak days that BZG would require the extra capacity." They also add that the Portway Park and Ride was discontinued on viability grounds due to low usage and there is no reason why a Park and Ride at Wild Place would be more successful.

Turning to the other options raised by amenity groups, the potential provision of multi-storey car park on the Zoo's west car park site was explored at the time of the 2013 application. At the time the Zoo commissioned Barlow Henley Architects to consider this option in more detail and the key findings were as follows:

- i) The existing surface car park has capacity for 160 spaces and is of irregular shape;
- ii) A three storey car park would result in an overall capacity of 263 spaces i.e. an increase of 103 spaces
- iii) The cost of the providing the car park is anticipated to be in the order of £3.2 million
- iv) This is equivalent to £32,000 for each car parking space created

The conclusion reached was that the provision of a multi-storey car park on the west car park would not provide anywhere near sufficient parking capacity to avoid the need for the overflow car park on Ladies Mile and provide a permanent solution at a very high cost to a problem that only occurs on a limited number of days a year.

The site is located within the Clifton Conservation Area and opposite Clifton Pavilion which is a Grade II Listed Building and is surrounded by residential properties. The drawings submitted were limited to plans with no elevational details provided. Nevertheless, it was considered that a three-storey car park building occupying the entire site and being built up to the boundary with residential properties was likely to raise significant issues such as the impacts on the Conservation Area; setting of the adjacent Listed Building and the amenity of surrounding residential properties.

The proposal could have some impact on the use of the Ladies Mile site for overflow parking in terms of reducing its level of use. However, given it would only be able to provide an additional 103 spaces it would not eliminate the need for overflow parking at the site. The costing details were not independently checked; however, they were adequate to demonstrate that such a proposal would result in significant expense for the Zoo. In conclusion, it was considered that although potentially reducing the use of Ladies Mile, the level of reduction would not provide a viable alternative to the use of Ladies Mile for overflow parking.

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Use of Clifton College car parks:

The applicant has also advised previously that they have investigated whether existing parking at Clifton College could be used for Zoo parking, but that this was found to not be an option because the college continuously use their parking facilities outside of school hours when various clubs and activities continue to be run. It is therefore agreed that this is not a viable alternative option to the use of Ladies Mile for overflow car parking.

Travel Plans:

Despite the efforts of the Zoo, surveys reveal that the targets set in previous Travel Plans in order to achieve a modal shift away from the car have generally not been achieved. Over the last three years the visitor modal split has been as follows:

Mode of Travel	Visitor Groups Modal Split		
	2014	2015	2016
Car	84%	76.2%	80.4%
Bus	5%	8.6%	3.9%
Train	5%	2.6%	9.2%
Coach	1%	4.6%	1.3%
Park and Ride	N/A	2.7%	2%
Cycle	0%	0.7%	0%
Walk	4%	4.6%	2.6%
Other	1%	0%	0.6%

Downs for People and other objectors have commented that the Zoo has produced travel plans since 1998 but that these have not reduced its parking requirements.

The latest Travel Plan has an objective to reduce car use by 5% by 2019 and to increase awareness of travel incentives which the Zoo offers. To recap, these are a discount of 33% off the admission fee for travelling to the site by bike, bus, or by a non-First Great Western (FGW) rail service, (increased from a discount of 20% earlier this year), whilst an existing offer has been retained that awards 2 for 1 entry for those that have travelled by a FGW rail service. (Transport officers had originally sought a 2 for 1 entry on all sustainable modes of transport. However, this was rejected by BZG on the grounds of viability, regardless of whether such a promotion may increase visitor numbers.)

As mentioned in the TDM comments above, a *Summary Action Plan* is included within the April 2017 version of the Travel Plan and is appended to this report. This provides full details on the measures BZG will be adopting throughout 2017 for staff, visitors, students and corporate visitors.

It should be noted that the Zoo actively engages with the Council's Travel Plan Officer and through its travel plans is endeavouring to reduce car travel to the Zoo. As outlined above, a number of recent measures have been introduced within the Travel Plan, and there will be ongoing monitoring in conjunction with BCC's Travel Plan officers to assess the success of these measures. Further amendments and improvements will be sought for the Travel Plan when required as a living / evolving document in order to achieve the targets set out in the Plan.

(C) DOES THE PROPOSAL SATISFACTORILY ADDRESS ECOLOGICAL ISSUES?

The site is identified as a Site of Nature Conservation Interest (SNCI) within the Bristol Local Plan (Site Allocations and Development Management Policies, Adopted July 2014). The key relevant Local Plan policy is Policy DM 19: Development and Nature, section 2.19.4, page 41, which states that: '*Development which would have a harmful impact on the nature conservation value of a Site of Nature Conservation Interest will not be permitted.*'

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The designation of the site as an SNCI reflects its special significance as a wildlife habitat in the urban environment, and its value to the local community as a resource, and as a place where local residents can have direct contact with nature. The site is designated against strict criteria, which have established that the site is of substantive value for nature conservation on a local basis. The value of the site is as part of the overall Clifton and Durdham Downs SNCI, although in size terms it represents a small proportion of the overall designated Downs area.

The site of the temporary car park comprises an area of semi-improved calcareous grassland, supporting a number of characteristic species. The grassland has been subject to a monitoring regime since 2006 to assess the impacts of the car park on the botanical interest present. This involved monitoring of both the car park and a control site to try to establish any changes in plant species composition over time, and whether these are linked to the use of the temporary car park. The legal agreement attached to the previous application required annual botanical survey reports to be provided as well as ongoing mitigation works.

The most recent submitted vegetation monitoring report for 2016 indicates that: 'there is no evidence of any ongoing decline in the diversity of plants of unimproved grassland in the car parking area, and in recent years some evidence of an increase', and that: 'there is no evidence of any ongoing increase in the diversity of plants indicative of disturbed conditions in the car parking area.' In addition spring cinquefoil, a nationally scarce plant, has been recorded within the site since 2010.

Despite this, in December 2016 it was apparent that there are some bare areas of soil near the road entrance from Ladies Mile. There are also some prominent vehicle tracks on the grassland on the site (although it is accepted that it is quite possible that some of these tracks were caused by vehicles not connected with the approved use of the site for car parking). There are a number of undesirable potential ecological impact pathways from the parking of cars on the designated Site of Nature Conservation Interest including erosion, compaction and the shading of vegetation. There are also potential negative impacts such as the spillage of oil from car engines which cannot readily be mitigated for.

The applicant is seeking a three year extension of the existing permission. Requirements for continued ecological monitoring and mitigation works are to be secured within an extended Section 106 Legal Agreement. This will ensure that there is continued botanical monitoring and that ecological mitigation/remedial work is carried out prior to each year of use for car parking.

The number of days of car parking per year which would be permitted is set to decline year-on-year from 2017 to 2019 and this is welcomed. Nevertheless, the parking of vehicles on the SNCI is not an optimal long term arrangement from the point of view of ecology for the reasons given above. The applicant is aware of the desirability of continuing to seek a more ecologically sustainable alternative long term solution instead of car parking on this part of the Downs after the requested three year extension.

(D) WOULD THE PROPOSAL BE HARMFUL TO THE ARCHAEOLOGY OF THE AREA?

Comments were made at the time of the previous application in 2013 by the Bristol and Gloucestershire Archaeological Society and the Conservation Advisory Panel that the effects of car parking on the archaeological resource had not so far been considered. The concern was that damage caused by continual use by cars in all weather conditions might be deleterious to the underlying fragile archaeology where the carboniferous limestone soil is very thin and survival of the archaeological resource unknown.

Officers were - and remain - of the view that, in light of the mitigation measures (parking protocol), which ensure that no parking is allowed when conditions are wet, together with the changes of entrance that there will not be undue erosion. However, it was considered that an initial rapid contour survey should be undertaken to record the current surface, at an agreed time after the approval, and

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again before the approval expires so that it would be possible to determine whether any damage is being caused to the archaeological value of the site. A condition was attached requiring such a survey to be carried out within three months of the date of the approval as well as a further assessment at the end of the application period. However, the required survey work was not done. A similar condition requiring the survey work to be carried out within one month of the date of the approval and a further assessment at the end of the application period is now proposed.

(E) DO THE PROPOSALS IMPACT UPON THE TOURISM OFFER OF THE CITY?

The applicant has advised in a supporting statement that the closure of Ladies Mile for visitor parking would result in a “Huge financial loss to the Zoo”. The statement continues by stating that it is estimated the Zoo could lose £500,000 in income each year, and adds that this is the equivalent of funding the Zoo’s entire award-winning education team for more than three years. Further comment is made that the knock-on effect of not being able to park 343 cars on 38 days [the basis for the figures] would mean that the city of Bristol would lose out on nearly £2 million of economic benefit to the city.

The statement adds that the Zoo attracts more than 500,000 visitors a year and is the biggest paid-for destination in Bristol making it very important to the city’s tourist economy. A further estimate is made that visitors to the Zoo benefit the local economy by more than £51,000 per day and over £18.6 million per year.

The figures used and assumptions made in this statement have been contested by Downs for People and other objectors and has resulted in a series of submissions which are appended to this report, together with the responses to them made by the Zoo.

In summary, the main objections raised are that the figures quoted concerning the financial impact of Ladies Mile do not take account of three factors:

- Many users of the Downs car park do not pay for admission. The Zoo’s accounts show that 72% of visitors paid (the Zoo has over 20,000 members who pay an annual subscription, not for each admission)
- Most of the users of the Downs car park would visit the Zoo if the car park were not available (a survey for the Zoo in 2009 found that 83% of visitors would still come)
- The Zoo can provide attractive alternatives (Park and Ride, train travel or bus)

Downs for People state that by applying the 72% and 83% figures, the loss to the Zoo would be approximately £100,000 each year.

Objection has also been made concerning the projected loss to Bristol’s local economy of £2m from Ladies Mile, and the contribution of £18.6 million the Zoo makes to the city as a whole from visitors. Downs for People have stated that these figures are exaggerated and are derived from wrong assumptions regarding visitor behaviour and inappropriate use of figures from Great Britain Day Visits Survey Data. (Full details can be found in the DfP submissions appended to this report.)

In response, the Zoo stands by its use of all the figures quoted.

At the time of the 2013 application the Zoo set up an online petition stating that without the extra parking the future viability of the Zoo would be threatened. The Zoo has not sought to make such a claim with the current planning application. The issue is instead about the level of financial loss to the Zoo without Ladies Mile, with the Zoo estimating a loss of £500,000 a year, and Downs for people estimating that the loss would be in the region of £100,000. Clearly, what is not known is how potential visitors would react if Ladies Mile was not available. DfP suggest from the results of a survey in 2009 that 83% of visitors would still come, but whether this would happen in practice is open to doubt and would be dependent on various factors such as the availability of other parking options and alternative modes of transport.

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However, the significance of this income in terms of the future viability of the Zoo is not in question and the financial impact of the loss of Ladies Mile on the Zoo should be given little weight.

The Zoo's contribution to the City's economy and how it would be affected through the loss of the Ladies Mile site is also open to question. However, the Zoo is undoubtedly one of Bristol's key visitor attractions and plays a role in bringing visitors to the city. It also has value in terms of its cultural and educational contribution to the city. As such it is considered that some weight could potentially be given to this issue.

(F) COMMUNITY INFRASTRUCTURE LEVY – WILL THE DEVELOPMENT BE REQUIRED TO PAY?

No CIL is liable for the proposed development.

CONCLUSION

The Downs are a very important area of open space highly valued by the citizens of Bristol, and well protected through, amongst other things, well established Development Plan policies. It is recognised that the permanent use of this site is not appropriate and would be contrary to well established policies of the development plan. By the same token a series of temporary consents would not be appropriate without appropriate justification; mitigation measures and the ultimate working towards a common long – term solution.

In terms of long term solutions it is clear that considerable efforts have been made by the Zoo to promote alternative means of travel away from car travel and ultimately to reduce the reliance on this area for parking in the medium to long term. It is unfortunate that recent surveys have shown that despite best efforts the majority of the targets set out in the Travel Plans have so far not been achieved. It is hoped that with the new higher concession rates on offer for users of public transport and with continued collaborative working between the applicants and the Council's Travel Plan Officer, that further progress can be made in this regard.

The Zoo has stated that this will be the final application for temporary parking on the Downs, and the requested number of days for its use is being reduced from 40 this year, to 30 by 2019. While the Zoo's statement of intent is not binding, when taken together with the proposed gradual reduction in use of the site this can be seen as a commitment to finding alternative solutions to using the Ladies Mile overflow car park.

In the meantime, in terms of the physical impacts of the application site, the submitted ecological reports show that the temporary use, although resulting in some minor harm to the condition of the ground and landscape, has not resulted in further harm to the ecology of the grassland and that the condition is able to be remediated by minor works. The Authority's Ecological Officer is satisfied at this stage that the mitigation measures currently in place are acceptable for this temporary use.

It is recognised that the proposed temporary use, for up to 40 days of the year, and the potential 'harm' that is caused has to be weighed in the balance against other material considerations. The Zoo is clearly an important visitor attraction and one that contributes in some measure to the economy of the city and, in terms of its functioning at the present time, there would appear to be a degree of reliance on the Ladies Mile overflow car park.

Having considered all of the issues it is recommended that a further temporary consent be granted for 3 years. Officers come to this recommendation with the view that the ultimate objective for all concerned must be to reduce the reliance of the Downs for Zoo parking. It is hoped that after the 3 year period, measures will be in place so that the Zoo keep to their word and do not have to again apply for an extension of parking on Ladies Mile. In moving this issue forward during the life of this

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permission, your Officers will be working closely with the Zoo to help towards a solution and prepare for the time in 2020 when planning consent has expired.

RECOMMENDED GRANTED subject to Planning Agreement

(A) That the applicant be advised that the Local Planning Authority is disposed to grant planning permission, subject to the completion 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, Bristol City Council and any other interested parties. This is subject to the agreement being completed, at the applicant's expense, within six months of the date of this report. The agreement is to cover the following matters.

Visitor Travel Plan

Within one year from the date of the approval, the Visitor Travel Plan will be the subject of a review with the Local Planning Authority and annually thereafter on a date to be agreed with the Council. Following the review any measures deemed necessary to improve the Visitor Travel Plan will be submitted and the final revised Travel Plan shall be agreed in writing by the Local Planning Authority within three months from each review date; its provisions implemented with immediate effect.

Undertake an annual monitoring survey during July, (or such other month of each year as may be agreed with the Local Planning Authority in writing) to monitor the modes of transport used by visitors to Bristol Zoo and to provide a copy of the survey to the Local Planning Authority within two months from the date the survey is carried out.

Staff Travel Plan

Within one year from the date of the approval the Staff Travel Plan will be the subject of a review with the Local Planning Authority and annually thereafter on a date to be agreed with the Local Planning Authority. Following the review any measures deemed necessary to improve the Staff Travel Plan will be submitted and the final revised Travel Plan shall be agreed in writing by the Local Planning Authority within three months from each review date; its provisions implemented with immediate effect.

Undertake an annual monitoring survey during July (or such other month of each year as may be agreed with the Local Planning Authority) in writing to monitor the modes of transport used by staff to Bristol Zoo and to provide a copy of the survey to the Local Planning Authority within two months from the date the survey is carried out

Corporate Travel Plan

Within one year from the date of the above approval the Corporate Travel Plan will be the subject of a review with the Local Planning Authority and annually thereafter on a date to be agreed with the Local Planning Authority. Following the review any measures deemed necessary to improve the Corporate Travel Plan will be submitted and the final revised Travel Plan shall be agreed in writing by the Local Planning Authority within three months from each review date; its provisions implemented with immediate effect.

Undertake an annual monitoring survey during July (or such other month of each year as may be agreed with the Local Planning Authority) in writing to monitor the modes of transport used by corporate visitors to Bristol Zoo and to provide a copy of the survey to the Local Planning Authority within two months from the date the survey is carried out

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The overflow car park, the subject of this application, not to be used unless there is in place an up to date Corporate; Staff and Visitor Travel Plan, agreed in writing by the Local Planning Authority.

Survey and Monitoring Reports

Throughout the duration of the Planning Permission survey record and monitor the Society's use of the Property such surveying recording and monitoring to include a record of the dates on which the Property is used the number of cars parked on the Property and the prevailing weather conditions and shall after each Season's use provide the results of the survey recording and monitoring to the Local Planning Authority and shall evaluate and utilise all such information in discharging the Visitor Travel Plan, Staff Travel Plan and Corporate Travel Plan obligations of this agreement.

The Society is to survey record and monitor visitor numbers to Bristol Zoo for all days of the year and report the information to the Local Planning Authority together with records of use of Bristol Zoo car parks at the time of submission of the Visitor, Staff and Corporate survey data. The scope and content of the monitoring survey is to be approved by the Local Planning Authority.

(ii) The Society is to annually survey record and monitor visitors using the overflow car park and report the information to the Local Planning Authority. The scope and content of the survey is to be approved by the Local Planning Authority prior to undertaking the survey.

(iii) The Property is not to open as an overflow car park unless justified by the number of visitors to Bristol Zoo arriving by car on any particular day.

(v) The Society is to participate annually in the Big Commuter Count for the City of Bristol on a day to be specified by the Council

Costs

(8) The Society will pay the sum of £1,000 per year (index linked) for the duration of the permission to cover the Council's costs of approving and monitoring the performance of the Travel Plans, all surveys and the use of the Park and Ride scheme.

(9) Throughout the duration of the Planning Permission the Society will participate in discussions with the Council relating to the Coach Park Strategy TROs CPZ Park and Ride Schemes and other transport initiatives in order to further the aims and objectives of the Visitor Travel Plan the Corporate Travel Plan and the Staff Travel Plan.

(10) The Society will pay the sum of £1,000 (index linked) for footpath improvements or ongoing maintenance to the path from the property to the pedestrian crossing on Clifton Down.

Ecological Monitoring and Works:

(11) Throughout the period of the Planning Permission the Society will procure the annual monitoring of the condition of the Property and the flora thereon by a suitably qualified ecologist approved by the Council ('the Ecologist') and procure the drawing up in consultation with the Council of an appropriate monitoring programme and in particular :-

(i) During October of each year the permission covers the Society will procure detailed condition surveys by the Ecologist of the Property and prepare and submit to the Council a report on the condition of the Property together with the Ecologist's recommendations for the future management of the Property to mitigate damage to the Property and changes in the composition of the flora thereon and the proposed remediation measures and to carry out all remedial work recommended by the Ecologist within three months from approval by the Council or as otherwise agreed to the satisfaction of the Council.

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(ii) Prior to the use of the Property for the next Season (and after the final year's use of the Property) following each further survey the Society will implement the recommendations made by the Ecologist for the future management of the Property and/or such other remediation and/or management measures as the Council may reasonably specify.

(iii) Prior to the expiry of the Planning Permission the Society will procure a detailed botanical survey of the Property and the flora thereon by the Ecologist during the growing season to assess the nature conservation interest of the grassland at the Property to establish the environmental impact of the use of the Property during the previous three years by comparing it to the Baseline Report dated October 2006 carried out by Wessex Ecological Consultancy ('Baseline Report') and submit to the Council for its approval.

(iv) The Society will Obtain the Ecologist's recommendations as to the remedial work reasonably required to bring the Property up to the standard identified in the Baseline Report and to carry out all recommendations and remedial works suggested by the Ecologist to the satisfaction of the Council within three months from expiry of the Planning Permission.

Monitoring Fee:

(12) A fee of £29.25 to cover the proper and reasonable costs incurred by the council in connection with the monitoring of the obligations contained in the agreement. All monetary contributions to be index linked to the date of committee.

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:

RECOMMENDED GRANTED subject to condition(s)

Time limit for commencement of development

1. The use hereby permitted shall be discontinued and the land restored to its former condition on or before 3 no. calendar years from the date of this permission.

Reason: A permanent use of The Downs for car parking would be unacceptable and contrary to policies BCS9, BCS10 and BCS22 of the Bristol Local Plan, Core Strategy (June 2011), and policies DM1, DM14, DM16, DM17, DM19, DM23 and DM31 of the Site Allocations and Development Management Policies (July 2014).

Pre commencement condition(s)

2. Prior to the first use of the overflow car park each year a plan at a minimum scale of 1:500 of the parking layouts and the access points, including details of the maximum number of spaces, shall be submitted to and approved in writing by the Local planning Authority. The plan will also detail the location of the spring cinquefoil and include measures for its protection within a revised parking protocol.

Reason: To ensure safe and adequate means of access and to minimise damage to the wildlife interest of the site.

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3. Prior to the use of the overflow car park each year details of any temporary signage for the pedestrian route to the zoo from the overflow car park via the controlled pedestrian crossing point on Clifton Down and a removal strategy shall be submitted to and approved in writing by the Council. The signage shall accord with the approved details and be removed in accordance with the strategy.

Reason: To ensure that the appearance of the signage is satisfactory and that the character and appearance of this part of The Downs Conservation Area is not harmed.

4. Within one month of the date of this approval (unless otherwise agreed in writing by the Local Planning Authority) an initial rapid contour survey of the application site, to the satisfaction of the Local Planning Authority, shall be carried out and submitted to the Local Planning Authority. A further survey, to the satisfaction of the Local Planning Authority, shall be carried out and submitted to the Local Planning Authority prior to the permission expiring. The survey shall be carried out by an archaeologist or archaeological organisation approved by the Local Planning Authority.

Reason: In order to determine whether the temporary parking use is resulting in harm to the archaeological value of the site.

Post occupation management

5. The use hereby permitted is only for the parking of cars between the hours of 10:00 and 18:30 and shall only take place for the following maximum number of days in each calendar year: 2017 - 40 days; 2018 - 35 days; 2019 - 30 days.

Reason: A permanent use of The Downs for car parking would be unacceptable and contrary to policies BCS9, BCS10 and BCS22 of the Bristol Local Plan, Core Strategy (June 2011), and policies DM1, DM14, DM16, DM17, DM19, DM23 and DM31 of the Site Allocations and Development Management Policies (July 2014).

6. The overflow car park hereby permitted shall be operated in accordance with the submitted Parking Protocol (to be amended as required by condition 2), unless otherwise agreed in writing by the Local Planning Authority.

Reason: To protect the nature conservation value of the site.

List of approved plans

7. 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.

Travel Plan Final Version, received 27 April 2017
26412_PL01 Location plan - a3 (003)., received 22 November 2016

Reason: For the avoidance of doubt.

Supporting Documents

1. Land off Ladies Mile

1. Ramblers – Objection – January 2017
2. Open Spaces Society – Objection – 24 December 2016
3. Downs for People – Objection 2: transport and travel issues – 23 January 2017
4. Downs for People – Objection 3: financial and economic – 9 February 2017
5. Downs for People – Objection 4: impact on the Downs – 24 February 2017
6. Zoo's response to objections from Downs for People – 21 February 2017
7. Zoo's response to objections from Downs for People – 22 February 2017
8. Zoo's response to objections from Downs for People – 7 March 2017
9. Downs for People – Objection – 27 February 2017
10. Zoo's response to objections from Downs for People – 16 March 2017
11. Downs for People response to zoo's response – 17 April 2017
12. Summary of action plan
13. Site location plan



Application 16/06311/X: use of land off Ladies Mile

OBJECTION BY THE RAMBLERS (AVON AREA)

The Ramblers is a national organisation which aims to:

- (1) protect and improve places where people can walk; and*
- (2) promote walking.*

The Avon Area has over 2000 members in what used to be the county of Avon. It has eight groups, of which the two largest cover Bristol. The Bristol group has over 700 members and the Brunel group, aimed primarily at people in their 20s and 30s, has over 400 members. A further five walking groups in the Avon area are affiliated to the Ramblers, of which two are in Bristol. A specialist committee deals with environment and planning issues across the area.

Summary

Zoo visitors' cars occupy one of the best parts of the Downs on many of the best days of the year. The cars have an impact over a much wider area and for a much longer period of time.

The car park and the parts of the Downs nearby are on popular walking routes in an attractive landscape with fine views. Zoo parking adversely affects walking by:

- (1) blocking key walking routes
- (2) spoiling views over a wide area
- (3) damaging the parking site
- (4) encouraging others to park on the site
- (5) causing congestion
- (6) preventing parking by would-be walkers
- (7) deterring walkers all day, every day, at the best times of the year.

Walking on the Downs is in theory fully protected by rights, laws and policies. The Downs are common land where people have had a right to walk for many centuries. National and local policies are intended to protect green spaces and promote walking.

Bristol Zoo is much loved by many people and is a valuable amenity. That cannot justify parking on the Downs in perpetuity, spoiling the enjoyment of many more people and contrary to national and local planning policies. The Zoo has used the Downs for parking for nearly fifty years and has no plans to stop. ***Planning permission must be refused and the Zoo must make proper parking and other travel provision for its visitors.***

The Zoo and the Downs should be complementary, not competing, attractions. We would like many more people to walk over the Downs to visit the Zoo. We would like Zoo visitors encouraged to explore the Downs on foot. We want the Downs freed of Zoo traffic so that everyone can enjoy them.

Introduction

1. The Ramblers has always objected strongly to Bristol Zoo using the Downs for parking. Our Bristol group has already lodged an objection to the current application. We are submitting an objection at area level too, as we have done before, because the Downs are of more than local importance and because a full response requires specialist environmental and planning knowledge.
2. This submission considers:
 - I. The importance of the site for walking;
 - II. The impact of zoo parking on walking;
 - III. The protection and promotion of walking: rights, laws and policies.

I: Importance of the site for walking

3. The Downs, with the Avon Gorge and Clifton Suspension Bridge, form Bristol's most iconic visitor attraction. They are a magnet for residents too. Many people walk or run on them daily and on fine summer days they are crowded with Bristolians and others. The Zoo car park is on one of the best parts of the Downs.

4. The site of the car park is on several routes which are popular with walkers. One links the Water Tower with the Suspension Bridge, two of the most prominent landmarks on the Downs. Another links the Zoo and Clifton Village with the main wildflower meadow, the peregrine watch, the goat gully and the Sea Walls viewing point. The site is an important part of any circular walk around the perimeter of the flat part of the Downs. When following these routes, people are not confined to narrow paths but can wander over a wide area and let their dogs and/or children run around.



5. Just off the site, many people enjoy walking along Ladies Mile on the tarmac path, or across the main wildflower meadow. Routes on the site and nearby are popular with joggers too: there is plenty of space for all.

6. The car park site and the meadow opposite are particularly important because activities elsewhere on the Downs often limit spaces for carefree, uninterrupted walking. There are fine views from the site, of the Downs close by and of the city and countryside further away.



II: Impact of zoo parking on walking

7. Zoo parking on the Downs adversely affects walking by:

- (1) blocking key walking routes
- (2) spoiling views over a wide area
- (3) damaging the site
- (4) encouraging others to park on the site
- (5) causing congestion
- (6) preventing parking by would-be walkers
- (7) deterring walkers all day, every day, at the best times of the year.

(1) Blocking key walking routes

8. The importance of routes across the site has been described in the previous section. When the site is covered by cars, or just cordoned off for parking, some routes are unusable and others unattractive. People do not want to negotiate a way through moving or parked cars, nor do they want to see, hear and smell them.



When the site is not in use, the cordons around it remain a deterrent to walking across it, even for those physically able to climb over or go under the barriers.



(2) Spoiling views over a wide area

9. The Council's planning officers noted in 1998 that: "the car park bringsvisual intrusion into this area of public open space... The parked cars are clearly visible from the north and west across Ladies' Mile, as well as from closer quarters, introducing an alien element into the attractive landscape of the Downs."

10. Nothing has changed since 1998 – the cars can be seen from far away and, because the site is high and exposed, have a significant impact. People do not go walking on the Downs to look at parked cars: there are plenty elsewhere in Bristol.



(3) Damaging the site

11. Parking has caused two types of damage to the site:

- (1) differences in the species composition of the grass sward compared to control areas nearby; and
- (2) bare patches of soil and vehicle tracks across the site and at the entrances.

Damage to the species composition of the grass

12. On the first point, most walkers, while preferring the lush grass found in the control areas, are probably not very concerned about the detailed composition of the grass. Ecological surveys since 2006 have, as the Zoo points out in its application, confirmed the grass is damaged but likely to recover if parking ends.

Bare patches and vehicle tracks

13.. The second type of damage - bare patches and vehicle tracks – is more significant. It has long made the site much less attractive for walkers. The Council's planning officers noted in April 1998 that 'the land has been used for parking for many years and shows signs of degradation in that the vehicular access points are worn bare, and bedrock and areas of soil are exposed within the parking area itself. Vehicular tracks are still visible from last year'.

14. The ecological survey in October 2012 found “more wear was evident ...than in previous years, probably a result of the exceptionally wet summer...Bare soil is generally limited to the area within 15 metres of the road but patches of bare ground mark the line of the westernmost, and most heavily used, track across the area.” The site did not recover over the winter: damage was still visible in March 2013 (below).



Similarly in December 2015, the survey found a marked increase in bare soil, which could have been because of the lateness of the survey. (The control area showed a similar increase, partly because of vehicular use - assumed unauthorised - in wet conditions.) On Good Friday 2016, the poor condition of the site and very wet conditions did not stop the Zoo using it for parking hundreds of cars. This, together with further unauthorised vehicular use, made the site unattractive for walking for the rest of the Easter holidays.



(4) Encouraging others to drive on to the site



15. Access to Zoo parking is not limited to Zoo visitors. The Ladies Mile site is cheap when it is attended and free from mid- afternoon when left unattended. No attempt is made to clear the site at 6.30 pm, when planning permission ends. Cars are often on the site after that time - visible from far away and making walking more difficult.

After 6.30pm in August 2016.

16. Seeing hundreds of Zoo visitors' cars driving on to the site may well encourage not just parking by other visitors but the type of particularly damaging unauthorised use noted in para 14 above.



Easter 2016

(5) Causing congestion

17. Parking on the Downs site has always produced congestion at peak arrival and departure times. In particular, there have often been blockages on Ladies' Mile at the entrance to the car park. When that car park is closed or full, there are problems of cruising cars looking for parking on other roads. Traffic congestion makes walking more dangerous, as well as unpleasant.



18. Congestion problems were made much worse in August 2015 when the Zoo issued over ten thousand cheap tickets. The whole area became gridlocked, with cars driving over the grass and abandoned on it. This made walking unpleasant for those able to reach the Downs. The traffic jams will have prevented or deterred some would-be walkers from going there.

(6) Preventing parking by would-be walkers

19. Surveys have always shown some Zoo visitors parking on the roads on the Downs. Their ability to do so greatly increased in 2016 when the City Council put an end to weekday commuter parking. The Zoo successfully lobbied for a five hour limit and no controls on Bank Holidays. When visitors find the Ladies Mile car park unexpectedly closed or full (as it often is by lunch-time), they have little choice but to park on the roads.

20. Parking on the roads on the Downs is visually intrusive and makes it more difficult to cross them. At peak times, there can be no spaces left by early afternoon for would-be walkers to park. This was the case when cheap tickets were offered in August 2015 and on August Bank Holiday Monday 2016.



21. If the Zoo reduces its use of the Ladies Mile site as the planning application proposes, there will be more parking on the roads on the Downs unless steps are taken to reduce the number of visitors arriving by car.

(7) Deterring walkers all day, every day, at the best times of the year

22. The Zoo's use of the Downs coincides with when other people most want to be there: weekends and Bank Holidays and in the school holidays from Easter to October. Because the public is unclear about the Zoo's pattern of use – which is anyway unpredictable – many would-be walkers avoid the site and the surrounding area for more days and for longer hours than necessary. The Zoo has been using the site for about forty days a year recently but no one – not even the Zoo – knows in advance which forty days it will use. That depends on the weather and state of the ground on the day. This will still be the case if use reduces to thirty days as proposed.

Protection and promotion of walking: rights, laws and policies

(1) Rights and laws

23. In theory, walking on the Downs is fully protected and actively promoted by rights, laws and policies. The Downs are **common land** which means that for many centuries people have had a **right** to walk freely there, without needing permission from the owner. This right is enshrined in the *Clifton and Durdham Downs (Bristol) Act 1861*, intended to safeguard the Downs as 'a place for the public resort and recreation of the people of Bristol'. A right of access on foot to common land was confirmed by the *Countryside and Rights of Way Act 2000*. Reflecting this, the Downs are shown on Ordnance Survey maps as land to which there is a right of access.

(2) Policies

24. National and local policies are intended:

- a. to protect green spaces; and
- b. to promote walking.

The key planning documents are the *National Planning Policy Framework* and the *Bristol Development Framework Core Strategy*. Other national and local policies have similar objectives, as outlined in the summary below. .

a. Protection of green spaces

25. Both the *National Planning Policy Framework* and the *Bristol Development Framework Core Strategy* contain strong commitments to protect and enhance valued landscapes such as the Downs. Development that would harm a conservation area should be allowed only where there are clear

public benefits that outweigh the harm. There is a commitment to ensure best use is made of open spaces in Bristol to meet the needs of residents and employees in the city. Important recreational open spaces will be protected (policy BCS9).

26. Parking on the Downs contravenes all these policies. Some of the harm done has already been described. (Zoo parking is not primarily meeting the needs of residents and employees in the city: the majority of users neither live nor work in Bristol).

b. Promotion of walking

27. Both the *National Planning Policy Framework* and the *Bristol Development Framework Core Strategy* seek to improve health and well-being. They recognise the value of open spaces, sport and recreation. Both emphasise the requirement to meet *local* needs.

28. The *2011 Natural Environment White Paper* also stresses the economic and social benefits of green infrastructure. Everyone should be able to make the most of ‘nature’s health service’. It points out that this is a theme of the 2010 Health White Paper *Healthy Lives, Healthy People: Our strategy for public health in England*, under which responsibilities for public health were transferred to local authorities in 2013.

29. Local authorities are already promoting walking and other recreation in Bristol. The *West of England Joint Local Transport Plan 3 2011-2026* seeks, for example, to provide a safer environment for pedestrians and cyclists and to minimise the impact of transport on the natural and historic environment. It includes a supplementary document on walking which aims to make walking the first choice for local trips and to increase recreational walking. It recognises the importance of protecting green spaces for those on foot.

30. Bristol City Council has published its *Walking Strategy for Bristol: Our Vision for 2011-2021*. This aims to make walking - both for recreation and as a mode of travel - easier, safer and more pleasant, in ‘a city where people drive less and walk more’. Opportunities to walk in Bristol’s green spaces should be protected and enhanced.

31. Bristol has a *Walk for Health* programme organised by *Active Bristol*. This supports Bristol’s diverse communities to become more active through walking. It encourages people of all ages and abilities to enjoy Bristol’s great outdoors. Every May the city hosts the largest urban *Walking Festival* in the country. The *2011 Natural Environment White Paper* pointed out that local authorities’ new Directors of Public Health are ideally placed to expand such initiatives and to link the management of areas such as the Downs with public health benefits.

32. Zoo parking on the Downs contravenes all these policies intended to promote walking. It not only prevents people walking on the Downs for pleasure but also makes it less likely that visitors to the Zoo will walk or cycle there.

Conclusions

33. This planning application is about whether thousands of cars should be allowed to park on the Downs every year. ***The Ramblers consider parking should not be permitted, because it interferes with people's right to walk on this fine green space.*** Refusal of permission would be consistent with national and local planning policies. Successive planning committees have been clear that a permanent permission would not be appropriate. They have given six temporary permissions on the understanding that the Zoo would take steps to end its use of the site.

34. Some have argued that permission should be granted because Bristol Zoo deserves support. The Zoo is undoubtedly a valuable amenity that gives pleasure to many people each year, including members of the Ramblers. But that cannot justify parking on the Downs in perpetuity, spoiling the enjoyment of many more people. The Zoo has used the Downs for parking for nearly fifty years and has no plans to stop. This is contrary to national and local planning policies. ***Planning permission needs to be refused now and the Zoo needs to make alternative parking and other travel provision for its visitors.***

35. The Zoo and the Downs should be complementary, not competing, attractions. We would like to see many more people walking over the Downs to visit the Zoo. We would like Zoo visitors encouraged to walk over the Downs to discover their wonders. ***We ask the planning committee to refuse this application so that everyone can enjoy the Downs every day without disturbance from Zoo traffic.***

*Tessa Wyatt,
Chair, Ramblers Avon Area.
January 2017*



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Development Management
Bristol City Council
PO Box 3176
Bristol
BS3 9FS

For the attention of Paul Chick

24 December 2016

Dear Sir

Application no 16/06311/X: parking by Bristol Zoo on land off Ladies' Mile

1. We are writing to object most strongly to yet another application by Bristol Zoo for a further three years' use of the city's Downs for parking. This is the seventh time that the Open Spaces Society has objected to this use since 1997. The reasons for our objections have always been accepted by councillors: they have given six temporary permissions with reluctance, on traffic grounds. We hope that this time a planning committee will find the courage to refuse the Zoo's application.

Longstanding objections

2. The reasons for our objections have not changed in essence since 1997, although the legislative and planning policy background is now slightly different. Our longstanding objections are as follows.

- The Downs are a magnificent open space, of inestimable value to the people of Bristol and much enjoyed by visitors too. Parking up to 660 cars on one of the best parts of the Downs on about 40 of the finest days of the year significantly interferes with people's enjoyment. People should be able to walk, picnic and play in a car-free environment.
- For centuries people have been able to wander freely over the Downs, first as common land and since 1861 as a place of recreation protected by the Clifton and Durdham Downs (Bristol) Act. The public has long had the right to roam here.
- The Downs should be fully protected by national and local planning policies, now mainly the National Planning Policy Framework 2012 and the Bristol

Development Framework Core Strategy. The planning committees that considered the previous six applications were in no doubt that parking was fundamentally unacceptable.

New grounds for objection: recent and proposed traffic increases/problems

Ineffective travel plans

3. To avoid traffic chaos around the Zoo, successive planning committees have decided to give the Zoo time to execute plans to reduce the number of visitors arriving in cars. This has not worked: the Zoo has produced travel plan after travel plan since 1998 without achieving any reduction. Indeed, the plan that it submitted with its last application in 2013 did not even have a reduction in the number of cars as an objective.

Recent traffic increases and problems

4. Since 2013, far from seeking to reduce the number of cars coming on to the Downs, the Zoo has tried to attract as many as possible. As well as its usual effective marketing, the Zoo has:

- **acquired more free parking on the roads on the Downs.** In 2015 Bristol City Council took steps to stop the roads on the Downs being used for commuter parking. It proposed a four-hour Monday to Friday parking limit. The Zoo successfully lobbied for five hours to allow for visits to the Zoo and for no restrictions on Bank Holidays. This means Zoo visitors prevent easy access by others to some of the best parts of the Downs all year. At peak times both Zoo visitors and others cruise around looking for spaces. On August Bank Holiday Monday there were no spaces left anywhere on the roads on the Downs by early afternoon;
- **offered bargain admission tickets throughout August 2015.** The Zoo sold over 10,000 tickets at almost half price, attracting almost that number of extra cars. This caused traffic mayhem on the Downs and surrounding roads. On the Downs, cars drove over the grass to avoid blockages and parked on the grass because there was nowhere else.

5. Even without bargain admission tickets, Zoo parking frequently causes traffic chaos. When open, the Ladies Mile site is full by lunch-time on peak days, leaving would-be Zoo visitors driving around looking for spaces. Traffic entering and leaving the site causes blockages. The site is not always open on peak days because the Zoo is not supposed to use it when the ground is wet. This causes severe traffic problems. On Good Friday this year, the traffic chaos was so bad that the Zoo used the Ladies Mile site even though it was wet.

Proposed traffic increases/problems

6. The Zoo is lobbying for support for its planning application on the basis that families have to be able to drive to the Zoo and that there are no practical parking alternatives to Ladies' Mile. At the same time, the Zoo is offering to reduce the number of days it uses the Ladies' Mile site to 30 days in 2019. ***Without any action proposed to reduce car travel to the Zoo, the current traffic problems will continue and worsen on peak days. Those who wish to enjoy the Downs will find it increasingly difficult to park on the roads.***

7. The Zoo offers no prospect of an end to parking on the Ladies' Mile site. ***Permanent parking has always been judged inappropriate and this is what, in effect, the Zoo is proposing.***

Conclusions

In 2010 we said that it was very clear that the Zoo would not make appropriate arrangements for its visitors until planning permission was refused. We repeated this in 2013. The events of the past three years and the current planning application show that we were right.

I trust you will advise the Planning Committee to refuse the application.

Yours faithfully

Kate Ashbrook
General Secretary

Downs for People

The Durdham Downs are for people, not for cars.

Application 16/06311/X: zoo parking off Ladies Mile

Objection 2: transport and travel issues

Downs for People is an informal organisation set up in 2013 to co-ordinate action to stop Bristol Zoo parking on the Downs. We want all the people of Bristol to enjoy all the Downs, all year round.

Summary

Transport and travel issues are why the zoo has been given six temporary permissions to park on the Downs in contravention of development plan policies. Permissions were given on the basis that the zoo would bring parking to a speedy end. ***Now that the zoo is offering no prospect of this, permission should be refused.***

This analysis looks at past and potential action on travel to the zoo. It proposes a way forward and examines the consequences of refusing permission. The annex contains a summary of relevant transport policies.

The analysis shows:

- **travel plans and surveys.** The council has required the zoo to produce travel plans and surveys for almost twenty years. This has given the illusion of activity but achieved nothing: 80% of visitors came by car in 1998, 91% in 2009, and 80% in 2016. Distances travelled have risen so that vehicle miles have increased. ***The latest travel plan makes it clear the zoo intends to park on the site indefinitely, while surveys show visitors would be happy to use alternatives.***
- **past action by the zoo and others.** The zoo has done little to provide parking or transport for its visitors. Experts have been unimpressed. In contrast, the Downs Committee has provided 180 permanent and 660 temporary parking spaces at extraordinarily low rates. Bristol City Council has provided 330 metered spaces on roads round the zoo and 1500 free spaces on roads on the Downs. The council and public transport operators have subsidised bus and train services to the zoo.
- **options:**
 - **park-and-ride.** The zoo's actions have been token gestures, made grudgingly. The services provided have been unattractive and poorly advertised. The only park-and-ride now is a public bus on the little-used Long Ashton route. The zoo's offer to provide £3 off entry and more promotion is derisory. There is much more potential – a Portway

service could accommodate 63% of visitors on peak days and 54% of visitors would consider using park-and-ride.

- **alternative car parks.** Development of the zoo's West car park is the obvious solution to the provision of parking for those visitors for whom park-and-ride, public transport, walking and cycling are not feasible options. A well-designed, substantial car park would remove the need not only for the use of Ladies Mile but also for the zoo's North car park for some of the year.
- **public transport, walking and cycling.** The zoo has done little to encourage these alternatives and plans to do no more. Its attitude is unnecessarily defeatist. Visitor surveys have shown that more visitors would take advantage of the existing incentives if they knew about them and additional incentives would attract more people. On peak days the zoo could run special bus services, as other events do.
- **charging more for admission and parking.** The zoo needs to vary its admission charges so that it does not attract more visitors in cars than can be easily accommodated. The zoo's parking charges are absurdly low compared with those elsewhere in the city. Parking charges need to be set high enough to provide an incentive to use other means of travel and to prevent people parking at the zoo to go elsewhere. As with admission, differential charges could be used to deter visitors at peak times and to attract them when there are spaces in the zoo's car parks.
- **publicity.** The zoo is skilled in the use of its web-site and social media. It could use these more effectively to attract visitors coming by alternative means of transport. It could deter visitors from driving by making it clear parking was not available.
- **a combined approach.** A combination of the measures above (or similar) could not only eliminate the need for the Ladies Mile site but also reduce parking by zoo visitors' cars on the Downs.
- **consequences of refusal.** There should not be any traffic problems if the zoo publicises the lack of parking and the alternatives effectively. If it does not, any problems are likely to be short-lived. The council has powers to prevent excessive use of on-road parking.
- **planning and transport policies.** National and local planning and transport policies do not support the zoo's claim that shared car use should be encouraged. There are firm commitments to reducing car use nationally and locally.

This cannot go on. Planning law requires applications to be determined in accordance with the development plan. Parking on the Ladies Mile site contravenes the development plan and many other policies. The zoo attracts about 126,000 cars a year, well over 1000 on a peak day. ***Planning permission must be refused. Only then will the zoo act to attract only the number of visitors that can be accommodated without causing traffic chaos and intruding on the local environment.***

I. Introduction

1.1. Last month Downs for People submitted its initial reactions to the zoo's application to continue to use the Downs as its biggest car park. We said that we would submit more detailed objections later. This is the first of our analyses, dealing with transport and travel issues. We expect to submit at least two further analyses, one dealing with the financial and economic issues raised in the application and the other with the impact on the Downs.

1.2. Transport and travel are key issues because they are the reason the zoo has been allowed to park temporarily on the Downs. Planning law requires that "applications for planning permission

must be determined in accordance with the development plan” (*National Planning Policy Framework, page 1*). Zoo parking on the Downs contravenes so many development plan policies that planning committees have always been clear that a permanent permission would be inappropriate. They have given six temporary permissions reluctantly, on the basis that the zoo would take steps to bring parking to a speedy end. They have wished to make the transition to alternatives easier for both the zoo and its visitors.

1.3. The zoo now says that: “For the last decade we have thoroughly investigated all other possible parking solutions and there are no practical alternatives [to the site on the Downs]”. (*Appeal for support sent to all zoo members in December 2016*). ***If that is so, the current application should be refused without further thought, as a transitional period will achieve nothing.*** In case the planning committee is in any doubt about this, we are setting out how little has been achieved in the last twenty years of ‘temporary’ planning permissions and how little the zoo is offering now. We also consider what might happen if permission is refused.

II. Contents

2.1. This paper examines:

- travel plans
- travel surveys
- past action by the Zoo and others
- how experts have assessed the Zoo’s efforts
- options
 - park-and-ride
 - multi-storey car park
 - public transport
 - charging more for parking and admission
 - publicity
 - a combined approach
- consequences of refusal
- planning and transport policies.

III. Travel plans

(1) History to 2008

3.1 Parking on the Downs was first licensed by the Downs Committee in the 1960s because zoo traffic caused congestion on peak days. It started with six days a year. As traffic increased, so did the number of days licensed, with an application for 102 days in 1996. The Downs Committee does not appear to have required any travel plans or other measures to reduce the need for parking. No planning application was made until early 1998, after public pressure and action in 1997 by the City Council’s Planning Enforcement Team. The planning committee which considered the zoo’s 1998 application deferred a decision for a year, requiring a transport strategy to be prepared. The following year the committee gave permission for one year only, to allow the progress of the

strategy to be monitored. ***And so it went on, with the zoo producing strategies/ plans as required while continuing to seek further permissions.***

3.2. The zoo made promises to stop parking to accompany the plans and applications. In 1998 it gave assurances that it would need to park on the Downs for only five more years. ***That did not stop it applying for a permanent permission in 2002.*** In 2003 the then new Zoo director, Dr Jo Gipps, acknowledged that parking on the Downs was unacceptable and said "I am personally committed ... to rectifying the situation".

3.3. Councillors were increasingly exasperated by the repeated applications and lack of action. In October 2008 a planning committee agreed unanimously that parking must end. They gave the zoo a year to "sort itself out" (the Chair's closing remark) by making alternative arrangements. They warned the zoo not to come back for another permission.

(2) History since 2008

The Pinnacle review and the task and finish group

3.4. The zoo did not rush to find alternatives despite the planning committee's displeasure. Instead of commissioning an action plan in autumn 2008 to accommodate visitors without Ladies Mile, the zoo appointed consultants late in 2009 to produce an analysis comparing other options with the continuing use of Ladies Mile. The zoo will have known they could not be prevented from applying for a further permission.

3.5 Work was undertaken as follows:

- **spring 2009** Zoo established a 'task and finish' group with council officers to consider possibilities, led by WYG planning consultants.
- **28 May 2009** Group first looked at options.
- **August 2009** Pinnacle Transportation undertook surveys of users of the Ladies Mile car park and parking in surrounding streets.
- **September 2009** Pinnacle produced review of options.
- **October 2009** Task and finish group met again.
- **December 2009** Zoo applied for a five-year planning permission.

3.6 ***The Pinnacle review was not a 'thorough investigation'***: it looked superficially at only five options, including the continued use of Ladies Mile and doing nothing. The report considered each option in isolation, largely from the zoo's point of view, making no attempt to consider their combined effect. It under-estimated the potential of individual alternatives (see analyses at section VII below). Unsurprisingly, it concluded that parking at Ladies Mile would be needed 'for the foreseeable future'.

3.7 The zoo has done little further investigation since the Pinnacle report. Both its 2013 application and the current one have continued to rely heavily on that review. In 2013 the Zoo commissioned architects to look further at providing a multi-storey car park on its West car park because amenity organisations had pointed out the inadequacy of the Pinnacle findings (see para 7.24 below).

2013 and 2014 travel plans

3.8 The most significant change in the five-year travel plan submitted with the 2013 application was that **the zoo dropped its longstanding objective to reduce the number of visitors arriving by car**. It also proposed to drop the Park and Ride service introduced in 2010. There was no suggestion that the Zoo would no longer need the Ladies Mile parking at the end of the plan period (2018) nor that people's travel habits would change in any significant way.

3.9 Councillors were unimpressed by this plan, which had not been approved by the council as required. As a condition of its planning permission, the zoo was required both to update its travel plan and agree it with the council within three months, and to review it annually. It was also required to maintain a park-and-ride service. It is not clear that the planning process was completed, **even though the Ladies Mile site was not supposed to be used until a plan had been agreed**. The current application refers to a *draft* 2014 plan with similar objectives to earlier ones. (It explains that the required park-and-ride strategy was drafted but not approved because of the introduction of a public bus service).

(3) travel plan submitted with the current application

3.10 The travel plan submitted with the current application is simpler than earlier ones. It is not clear whether the targets have been approved by council officers. **That is unlikely as the proposed visitor travel targets have been reduced from nine to three**. The Zoo is no longer proposing to:

- reduce the proportion of visitor car trips
- increase the number of visitors coming by bike
- increase the number of visitors walking
- increase public transport use by visitors
- operate a successful park and ride service for peak days
- reduce carbon emissions associated with visitor trips
- increase the use of park and ride.

The only three visitor travel targets it is proposing – and only for this year - are:

- Single Occupancy Visitor travel of less than 10%. **Our comment: since it was 0% in 2016, 10% would be a huge increase. It would be amazing if a family attraction like the zoo had a rate as high as 10%.**
- Use of Ladies' Mile Car Park for a maximum of 40 days. **Our comment: an arbitrary limit which may cause traffic problems if set independently of reducing the number of cars arriving.**
- Increase awareness of travel incentives to 25% of visitors. (Currently only 5% to 13% are aware of travel offers).

The zoo argues that it does not have to reduce the overall number of cars because car travel is sustainable travel when car occupancy is high.

3.11 The only additional investigations carried out since 2013 have been into:

- **alternative car park locations.** All rejected (see para 7.20)
- **real time bus passenger information screens.** Rejected.
- **signage for the Portway Park-and-Ride for the Zoo.** Rejected as too expensive (see para 7.16)

3.12 The 2016 application is accompanied by a transport statement which appraises various options, mainly on the basis of earlier investigations. This is considered later.

Our view of the zoo's travel plans: a distraction that have given the illusion of activity but achieved nothing. Until 2013 they contained targets to reduce car travel unaccompanied by action to achieve that. The latest plans have the merit of honesty: they make it clear the zoo expects to park on the Ladies Mile site indefinitely.

IV. Travel surveys

4.1 As a condition of its planning permissions, the zoo has been required to undertake annual visitor travel surveys since 1998. The most recent surveys appear to be based on a much smaller sample than before: 153 visitors over a five -day period in August 2016, compared with 9628 visitors in 2010, 9220 in 2011, and 7652 in 2012, all over 14 day periods. A small sample is unlikely to produce statistically significant results.

4.2 These surveys show that little has been done to reduce the demand for parking:

- in 1998, 80% of visitors arrived by car, 10% by coach and 10% came by public transport, walking or cycling;
- in 2009, 91% came by car, none by coach, and 9% by public transport, walking or cycling;
- in 2016, 80% came by car, 1% by coach and 17% by public transport, walking or cycling (small sample so may not be statistically significant).

The distances travelled have increased since 1998. This means there will have been an increase in visitor miles.

4.3 Surveys have also asked visitors about alternative means of travel. The Pinnacle surveys in 2009 found that only 17% of the users of the Downs car park would not visit if it were not available. The 2016 survey found that 54% of those coming by car would consider Park and Ride; 27% would consider using the discount available to those coming by train; 9% expressed an interest in the bike offer; and 24% in the bus offer.

Our view of the visitor surveys: they show that less than nothing has been done to reduce the demand for parking at the Zoo. They also show the great potential of alternatives. Most visitors would not be deterred from coming if the Ladies Mile car park were not available, as the Zoo has suggested.

V. Past action by the zoo and others

(1) The zoo

5.1 The zoo has taken little direct action to accommodate the cars it attracts or to offer alternatives. In terms of accommodating cars, it opened its West car park with 160 spaces in 2002, but this only replaced parking that had previously been available at Clifton College. It has offered some small discounts for those coming by public transport and for a short period ran a limited park-and-ride service (see below).

5.2 Far from seeking to balance the number of cars it attracts with the parking available, the zoo has sought to attract the maximum number of visitors. The excess was most evident in August 2015 when the zoo sold over 10,000 tickets at half-price. The great majority of these would have been

family tickets so that up to 10,000 extra cars will have come to the zoo. The zoo told purchasers that there was on-site parking but warned them 'to come early to avoid disappointment'. For much of the month they needed to come early to avoid traffic jams.

(2) The Downs Committee

5.3. The Downs Committee has been the chief provider of car parks. The zoo's North car park is part of the Downs, used as a car park since at least the 1950s. The terms of the zoo's licence from the Committee (if one exists) are not readily available – the zoo appears to pay only £24k a year for its use as a 180 space permanent car park. This is the only zoo car park in use by zoo visitors throughout the year - the West car park is often open only to Zoo staff and/or for corporate events.

The North car park is well-used. Assuming 80% average occupancy for 364 days with visitors paying an average of £2.33 (a third are members), the zoo's revenues would be about £122k a year. Given that non-members pay admission, the value to the zoo will be greater.

Our comment: If our assumptions are correct, the Downs Committee is providing a very large subsidy for the private use of public open space in its care.

5.4. The Committee has also licensed use of the 660 space Ladies Mile car park since the 1960s (para 3 above). Our understanding is that the zoo originally agreed to give the Downs Committee a third of its takings, estimated at about £8k a year. The payment seems to have stayed at this level.

In 2016 an average of 343 cars used the car park on 38 days. Because it opens late, a high proportion -say 90% - of users will be non-members, paying £3. The remainder will pay £1. This gives takings of £36,500. The Zoo's outgoings in running the car park are minimal, so that it will make at least £20k a year from the car park alone. While the zoo's figure of a £500k potential loss in overall takings is exaggerated, the true value to the zoo is very much more than it is currently paying the Downs Committee.

Our comment: as with the zoo's North car park, the Downs Committee is providing a generous subsidy for the use of public open space in its care.

(3) The council

5.5. Bristol City Council has been an even more generous provider of zoo parking and alternative transport to the zoo. It has:

- **allowed parking on neighbouring roads.** In the 1980s, the council limited the impact of zoo visitors on local residents by prohibiting parking on roads round the zoo at peak visiting times. These restrictions were lifted, probably some time in the 1990s. The roads were used increasingly by commuters. When the Council introduced a Residents' Parking Scheme in early 2015, the zoo successfully lobbied for a five -hour limit on metered parking in these roads rather than the three hours originally proposed and which applies everywhere else in Clifton. (Five hours is apparently the average time of a zoo visit). There are now 330 metered spaces. Charges are low at £1 an hour. At weekends and Bank Holidays parking is free of charge both in the metered spaces and the rest of the area covered by the Residents' Parking Scheme.
- **provided generous free parking on roads on the Downs.** In 2016 the council introduced parking restrictions on the roads on the Downs to prevent them being used by commuters.

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 1500 spaces on the roads on the Downs.

- **subsidised bus and train services to the zoo.** The 901 bus service from the Portway Park and Ride to Clifton and train services on the Severn Beach line have been subsidised by the council. Other bus services may have been as well.

Our comment: the council has repeatedly acceded to requests from the zoo for favourable treatment, relaxing actual and proposed parking restrictions. It is unclear why car travel to the zoo should be treated more favourably than travel to work.

(4) Transport providers

5.6. Transport providers have done much to improve transport to the zoo in recent years. In particular:

- **Rail.** Service on the Severn Beach line has dramatically improved, with more frequent daytime services and Sunday services. GWR offers 2 for 1 tickets to the Zoo. This will all have contributed to the significant increase in rail travel.
- **Buses.** The 901 service from the Portway Park and Ride was introduced and the 505 service was extended to the Long Ashton Park-and-Ride.

Our view of past action by the zoo and others:

The zoo has done nothing significant to accommodate growing numbers of visitors arriving by car. It has provided only the partial use of a 160- space car park for part of the year. It has sought to attract as many visitors as possible, irrespective of the parking available.

In contrast:

- ***the Downs Committee has allowed the Downs to be turned into car parks for 840 cars at extraordinarily favourable rates.***
- ***Bristol City Council has lifted and reduced restrictions on parking in the roads near the zoo and on the roads on the Downs. There are now 330 metered spaces and 1500 free spaces on weekdays and 1830 free spaces at other times.***
- ***Council subsidies for public transport services and improved services and incentives offered by their operators have also benefited the zoo.***

VI. How experts have assessed the zoo's efforts

6.1. The zoo suggests that its efforts have been applauded by travel experts: in particular it points to the Silver Level Accreditation award for travel planning it received in 2013 and the approval of the Task and Finish Group in 2010. As explained above (para 3.5) the Task and Finish Group looked in only a cursory way at the zoo's plans. The zoo makes no mention of the detailed – and highly critical – review by the Council's travel planning officer included with the case officer's report of the zoo's 2013 application.

6.2. The 2013 travel planning officer's review explained that the Silver Award was for the zoo's efforts rather than its achievements in travel planning over three years. It was not a higher level

award because the zoo had failed to meet targets, with staff modal shares showing adverse trends except in cycling and an increase in carbon emissions both by staff commuting, visitors and business travel. The award was mainly concerned with staff travel, not visitors.

Our view of the experts' assessment: the zoo's record has been - quite rightly - judged unimpressive.

VII. Analysis of options

7.1. This section looks at alternatives to the continued use of the Ladies' Mile car park as follows:

- park and ride
- alternative car parks
- public transport
- charging more for parking and admission
- a combined approach.

It examines past action and analyses, as well as future potential.

(1) Park and ride

2008 zoo vision

7.2 In discussions in 2008, the zoo's then Director of Estates suggested the zoo would be able to give up using the Ladies Mile site if the Portway Park and Ride car park (on the A4 close to the M5 Avonmouth junction) opened on Sundays. He said over 80% of the users of the Ladies Mile site at peak times came from South Wales along the Portway and he saw that a Park & Ride service could be very attractive. Journeys could be made simpler and faster than parking on the Downs by selling tickets on the bus, avoiding the path from the Downs car park and the queues at the entrance. He hoped to run a fleet of specially decorated zoo minibuses on the scenic route along the Gorge and up Bridge Valley Road. With a commentary on the bus, this could be a positive part of visitors' experience.

7.3 Unfortunately that Director of Estates left shortly afterwards and his successors have not shared his vision.

Pinnacle report: Park and Ride

7.4 Section 3 of Pinnacle's 2009 report contained useful background information on Park & Ride services. It revealed significant scope for using the Portway site relatively cheaply. It pointed out that in theory Park & Ride here could attract 63% of visitors to the zoo on peak days, equivalent to 385 to 770 cars. This would make parking on the Downs unnecessary. The subsequent analysis in paras 3.12 to 3.15 assumed, however, that Downs parking continued, so that the Park & Ride service would attract only 20% of these visitors.

7.5 As well as under-estimating likely use, the Pinnacle report exaggerated the costs to the zoo of providing a Park & Ride service. The costs in para 3.15 took account of existing parking income that would not exist if the Ladies Mile facility were removed and of hypothetical incentives to use the service that might not be necessary. It did not take account of the corresponding income from Zoo admissions. The concrete figures in this analysis show a cost of only £900 a day (£1,650 for the contract less £750 revenue). More use would reduce costs.

2010 planning permission Park and Ride requirements

7.6. Following the Pinnacle report, the zoo applied for planning permission in 2010. It offered to provide a trial Park & Ride service that was much less comprehensive than the one Pinnacle had analysed. It would run only on five bank holidays and four associated Sundays, i.e. 9 days altogether. The estimated gross costs were £1,750 per day plus publicity and "a small cost associated with security", say £20K in total. The zoo undertook to do this for only one year if occupancy were 50% or less. This seemed inevitable: charges higher than those for parking at Ladies Mile were suggested and it was assumed that the Ladies Mile facility would continue. This was a token scheme, apparently designed to fail.

7.7 Councillors were unimpressed by the 50% occupancy suggestion. They imposed a condition on the three- year planning permission that required a Park and Ride service from the Portway until May 2013. It would still run only on each Bank Holiday and the preceding Sunday.

Park and Ride from 2010 to 2013

7.8 Initially the Zoo ran a single decker bus at 20 minute intervals. Passengers travelled free and received a free drinks voucher. Because of low occupancy, this was replaced from 2011 by two 16 seater minibuses running on demand. Occupancy was higher but still below 25%. In addition, a park and ride service was operated on some Sundays and Bank Holidays from UWE. No data were kept for this.

7.9 The zoo calculated the costs of this service were £12.82 per passenger.

2013 planning permission

7.10 In their 2013 planning application, the zoo proposed to end the trial unless occupancy improved to 50%. They said that another Park and Ride service from their second site at Cribb's Causeway might be worth exploring at some point but were not optimistic.

7.11. Councillors were again unimpressed. They imposed a condition on their planning permission under which the zoo was to submit a park and ride strategy to the council within three months. ***The Ladies Mile site was not to be used unless there was an up-to-date Park and Ride Strategy in place, agreed with the council.*** This strategy was to include:

- a significant increase in the operation of the Portway Park and Ride service in conjunction with the cessation of the provision of the Ladies Mile overflow car park
- if occupancy levels fell below 50%, the zoo should submit proposals for increasing them.
- consideration of other Park and Ride sites including the Cribb's Causeway Zoo (now Wild Place).

Park and Ride since 2013

7.12 The transport statement accompanying the zoo's current application explains that these conditions were not met. The zoo submitted a strategy to the council but it was not approved, apparently because of the introduction of public Park and Ride services to Clifton and the implementation of residents parking schemes in Bristol (para 2.3.2 of the transport statement). ***It is unclear why the strategy could not have been updated to take account of these factors, nor why the use of the Ladies Mile site was allowed to continue in the absence of an agreed strategy.*** The zoo describes some aspects of the planning conditions, including 50% occupancy, as 'not reasonable'

(para 2.3.3). ***It is not clear whether council officers waived these conditions or if the zoo breached them.***

7.13 In 2014 the zoo continued to provide a limited Park and Ride service. As required, it did not use the Ladies Mile car park on at least some of these days. The zoo 'understands' that this led to congestion and complaints.

7.14 In 2015 and 2016, the zoo did not run its own Park and Ride services but depended instead on two public services:

- **901 from the Portway P&R to Clifton.** This ran at twenty minute intervals for two years until September 2016, usually only from Monday to Saturday. The zoo paid £8k to provide a Sunday and Monday Bank Holiday service in August and September 2015 and during the May half term in 2016, probably ten days in all. Occupancy was very low.
- **505 from Long Ashton P&R to Southmead.** This runs half hourly during the day from Monday to Saturday and hourly on Sundays.

The zoo offered Park and Ride passengers free P&R bus travel at Easter 2016. This rose to a more generous £3 per person in September 2016 (when the 901 service ended). Few people have taken advantage of the discounts - only 0.2% recorded in spring 2016 in the table at para 4.1.2 of the travel plan. The summer travel surveys showed few people coming by P&R – 2.7% in 2015 and 2% in 2016. The 2016 survey also showed that 78% of visitors were unaware that there were P&R services. As already noted in para 14, 54% said they would consider using P&R.

Our view of the zoo's past actions on park-and-ride: token gestures provided grudgingly. Unattractive and poorly-publicised.

Current application: the zoo's offer

7.15 The zoo is offering the following (para 7.2.4 of the transport statement):

- £3 off entry per person when using any P&R services stopping at the zoo.
Our comment: not much of an incentive given people will have paid bus fares and the comparatively high price of zoo admission.
- Promotion of the use of P&R on their web-site.
Our comment: ineffectual in the past and little use in the absence of any significant P&R service.
- At peak times, increased promotion of P&R usage on social media and members' e-letters.
Our comment: as with the web-site, no use in the absence of services to promote.

7.16 The zoo has rejected as too expensive the following suggestions by council officers:

- A 2- for- 1 admission for Park & Ride passengers. It claims: "Calculations have confirmed that this would not be financially viable for BZG which operates as a charity" (para 8.5.3) ***Our comment: this is an extraordinary refusal when the only P&R provision is hardly used at present and has limited potential – see below. It would cost hardly anything. The link with the zoo's financial viability and charitable status is unclear.***
- Signage from the motorway to the Portway P&R at £40-60k per static sign.
Our comment: the zoo seems unwilling to spend anything, despite the scale of its forecast losses.

7.17 The zoo has also explored:

- Use of the car park at the Wild Place with a bespoke P&R service to the zoo (para 5.2.4 of the transport statement). The zoo concluded that this was not feasible because the number of visitors at Wild Place had increased. It also said the “provision of a P&R service from a remote car park had not been deemed appropriate”.
Our comment: there is a lot of undeveloped space at Wild Place. P&R services have been deemed inappropriate only by the zoo.
- Whether the City Council’s variable formation sign on the A4 could be used to direct people to the Portway Park & Ride. Confirmation was awaited.
Our comment: sounds like a last-minute request, not part of a well-considered strategy.

7.18 The zoo appraises the potential and problems with future Park-and-Ride in paras 8.3.3 to 8.3.11 of the transport statement. The key points are:

- **Limited potential of the Long Ashton P&R.** Only 2% of zoo visitors come from that direction. Another 6% may use the new South Bristol Link Road. On a peak day, if all these visitors used the P&R it might accommodate 103-121 vehicles. Any other visitors would have to make a detour, increasing the number of vehicle miles.
Our comment: the potential may be limited but it would be some contribution. Detours by some visitors would not necessarily increase vehicle miles, particularly if buses ran full, and would help ease congestion round the zoo.
- **Inability of a public P&R service to cope with peak demand.** Calculations at paras 8.3.7 and 8.3.8 are based on accommodating half the Ladies Mile visitors on the busiest day on six buses at twenty minute intervals between 10am and noon. This would mean 136 visitors per bus based on peak use in 2016 and 195 visitors per bus based on the capacity of the car park. Waiting for a bus would deter visitors.
Our comment: the Pinnacle study showed a Portway P&R service could accommodate 63% of zoo visitors on peak days, equivalent to 385 to 770 cars. A public bus service is unlikely to be appropriate given the size of the peaks.
- **Impracticality of a private P&R service.** A private service is ruled out because of the unpredictability of the Zoo’s use of the Ladies Mile car park which is weather-dependent. Bus contracts have to be agreed in advance.
Our comment: unclear why this is a problem. The zoo knows when the peak periods are and could run a P&R service throughout. On wet days the service would be under-used.
- **Carbon emissions from a P&R service.** “The funding of a P&R service with low patronage is not in accordance with the conservation and ecology ethos of BZG”. (Para 8.3.11).
Our comment: this claim would sound better from an organisation that was not attracting hundreds of thousands of vehicles and causing traffic congestion. The zoo needs to look for P&R services with high patronage or for other ways of reducing its visitors’ carbon emissions if it wishes to adopt this particular tone.

Our overall view of the zoo’s Park-and-Ride offer: derisory. The only current P&R provision is the 505 service from the Long Ashton Park and Ride, which is hardly used by zoo visitors. When a Portway service could accommodate 63% of zoo visitors on peak days and when 54% of zoo visitors would consider using P&R services, there must be more potential.

(2) Alternative car parks

7.19 The transport statement (sections 5.1 to 5.3) considers alternative car parks.

(1) Locations away from the zoo

7.20 Section 5.2 explains that the zoo has explored:

- **Alternative locations in Clifton.** There is nowhere big enough to accommodate the full level of parking demand.

Our comment: it would not need to do so if a combination of measures were used.

- **Use of University, church and school parking.** Nothing was possible.

(2) The zoo's West car park.

7.21 As explained above, the zoo owns only the West car park on College Road. This is a surface car park with 160 spaces. The construction of a multi-storey car park on this site was considered in the Pinnacle report in 2009 and by architects commissioned by the zoo in 2013.

The Pinnacle Report

7.22 Paras 4.4 to 4.8 of Pinnacle's report considered the addition of a single storey to this car park, with para 4.5 pointing to significant advantages in developing it. The report suggested, however, that this would provide only an additional 20 spaces because of the 'irregular shape of the site.'

7.23 Objectors queried this because the site is almost rectangular. They pointed out that a single storey was anyway unambitious. This was a brownfield site surrounded mainly by four storey houses. Because it was in a Conservation Area, any development would need to be designed to fit in with its surroundings, but there was no reason in principle why a modest multi-storey car park should not be approved.

2013 review

7.24 In 2013, because local groups asked for this option to be re-examined during pre-application discussions, the zoo commissioned architects to look at it in more detail. They suggested a three – storey car park could produce 263 spaces at a cost of £3.2 million. The zoo rejected this option because:

- it would not provide sufficient parking to replace Ladies Mile;
- it would provide a permanent solution to a temporary problem;
- it would cost too much.

7.25 These were sketchy plans: in his report the planning officer regretted that elevational details were not provided. He accepted, however, that a car park on the site could raise amenity issues, especially in a Conservation Area, and would not eliminate the need for overflow parking. It could, however, potentially reduce the use of Ladies Mile.

Current application

7.26 The current application mentions this possibility at para 5.3.1 of the transport statement. It reports that it was rejected in 2013 because of the adverse visual impact in a Conservation Area and because it would not provide sufficient parking.

7.27 **We continue to see considerable scope for developing the West car park site.** The zoo's 2013 proposals, like those examined in 2009, are unambitious. In an area of four storey housing, a car park of the same height would fit in best with the street scene. A well-designed car park could enhance the Conservation Area. Four storeys could accommodate significantly more cars. If more were needed, further storeys could go underground.

7.28 **Our comments on previous objections to this option are as follows:**

- **insufficient parking to replace Ladies Mile.** That depends on how many storeys are built. In any case, the car park does not need to provide a complete replacement. There will always be some people who need to park near the zoo but the objective should be to reduce the numbers driving to the site.
- **a permanent solution for a temporary problem.** This could be the Zoo's main car park, used all year round, not only on peak days. Zoo staff and corporate visitors already make permanent use of the West car park. The North car park could be kept as an overflow, reducing interference with traffic on the main road. Supervision would be easier with staff not having to move between three sites. The car park could also reduce the numbers parking on surrounding roads and on the roads on the Downs, to the benefit of all.
- **cost.** The zoo should expect to pay to provide parking for its visitors, not to profit by charging for the use of public open space as it does at present. A four storey car park would not cost significantly more than a three storey one. The zoo has undertaken a steady stream of expensive capital projects for many years. £3.2 million is not a huge amount for a revenue- generating project at a time of low interest rates.
- **no encouragement of sustainable modes of travel.** This depends on how many parking spaces are provided; how much people have to pay for them; and what other encouragement is given for sustainable modes of travel. The continued provision of cheap parking on Ladies Mile has not encouraged, and will not encourage, sustainability.

Our view of development of the West car park: this is the obvious solution to the provision of parking for those visitors for whom Park & Ride, public transport, walking and cycling are not feasible options. Building a well-designed, substantial car park would remove the need not only for the use of Ladies Mile but also for the North car park for at least some of the year.

(3) Public transport, walking and cycling

7.29. As explained in section V, the zoo, the council, and public transport operators have all provided subsidies/ incentives for people to use means other than cars to reach the zoo. Most of these have proved ineffectual but the recent increase in rail travel and responses to visitor surveys show there is more potential. Past and possible actions are described below.

The Pinnacle report and 2010 application

7.30 Section 5 of the Pinnacle report considered initiatives to encourage visitors to travel by sustainable modes of travel. It was extraordinarily weak. It set out possibilities such as further

discounts, increased marketing, parking charges and improved pedestrian and cycle routes, but did not explore them in any depth. Para 5.5 of the report contained poor arguments against encouraging more sustainable travel. It ignored recent developments such as the much improved bus services to the zoo and the more frequent trains on the Severn Beach line, including a Sunday service. It concluded that other forms of transport were not a realistic option on their own, but much more could be done.

7.31. In 2010, the following were already available:

- **Bus.** Zoo safari ticket from First bus with discounted travel and zoo entry
- **Train:** GWR 2 for 1 offer on admission.

The zoo did not offer to do anything else.

2013 application

7.32. In its 2013 planning application the zoo said it would offer the following:

- Free cup of tea or coffee to those coming by public transport.
- Consideration of a discount for cyclists
- Sustainable travel information in event newsletters
- Member postcode mapping to target particular areas.

Our comment on the 2013 offer: both the cost to the zoo and the impact of these measures were likely to be negligible.

7.33. As mentioned in para 6.1 above, the travel plan officer was unimpressed by the zoo's travel planning. One of the conditions of the 2013 planning permission was that the zoo should produce a better travel plan within three months, to be agreed with the council. The plan produced in 2014 does not appear to have been approved.

Recent incentives and their effectiveness

7.34. Para 4.1.1 of the travel plan submitted with the current application recorded that the following discounts for sustainable travel had been operating:

- **Cycling** – 20% discount off entry.
- **Bus** – Safari ticket on First providing about a 20% saving
- **Train** – 33% discount off entry or 2 for 1 entry with GWR
- **Coach** – 20% off with National Express
- **Tourist bus** – 20% off.

7.35. The 2016 travel survey results suggested that only the discounts for train travel had been effective: 9.2% of visitors had come by train, 4.6% by bus, 1.3% by coach or minibus and 2.6% had walked (para 5.1.4). Most people were unaware of the discounts: 92%, 87% and 93% for the bus, train and bike discounts respectively (para 5.1.16). 27% of respondents were willing to use the train offer, 24% the bus offer, and 9% the bike offer. Price was a factor for those who said they would not. 5,500 visitors had made use of the travel incentives so far in 2016, about 1% of the total (para 5.1.23).

Our comment on the current incentives: given the low numbers coming by public transport and – presumably – a contribution in some cases by the transport operators, these incentives are not costing the zoo much. The train incentives are much more generous than the others and this may account for the higher numbers coming by train. It is clear many more people would come by

public transport if they knew about the incentives, particularly if the incentives were more generous.

7.36. The travel plan noted that the following measures were being considered (para 4.6.3):

- Promotion of the Travelwest buschecker app within the zoo and on the web-site.
Our comment: most people who use apps and buses will have this or something similar anyway. Unlikely to make more people come by bus.
- Provision of local travel maps on arrival or departure.
Our comment: seems a scattergun approach unlikely to produce results.
- BZG Experience App which would include travel information and promotion.
Our comment: more likely to produce results if there were more to promote.

7.37. Para 4.7.1 of the travel plan notes that real time passenger screens in the zoo had been considered with the council in 2015. These had been deemed inappropriate because of the limited bus services available.

7.38. The transport statement records (para 8.5.2) that the council's highways officer had sought 2 for 1 discounted entry for those coming to the zoo by means other than a car. As noted in the Park and Ride section above, this had been rejected as not financially viable for the zoo.

Our comment: many train passengers already qualify for this discount. The zoo would therefore need to offer it to only about 10% of its visitors. There is no evidence this would affect the zoo's viability.

7.39 The transport statement also contains (section 8.4) an appraisal of alternative travel options. It concludes:

- **Walking.** Limited potential as many visitors living locally already walk (Para 8.4.4).
Our comment: could target marketing and incentives at local people to get more walkers.
- **cycling.** Although 10% of respondents to the 2016 travel survey lived within reasonable cycling distance, none had come by bike. Any increase unlikely to significantly reduce the numbers of cars.
Our comment: could target marketing and incentives at those within range.
- **Train.** Promotion already successful.
Our comment: most of the promotion is probably by the train operators and the zoo will be one of many attractions targeted. More could be done. Surveys show that 87% of visitors do not know about the existing incentives. Zoo-run shuttle buses to Clifton Down and Temple Meads stations would help.
- **Bus.** Considers only the number 8 route. Bus travel deemed unattractive because of: need to change buses; many visitors living outside Bristol; travelling with young children. In any event, accommodating all the visitors on a peak day would require 33 buses. The no. 8 buses are already fairly full on peak days.
Our comment: these are particularly poor arguments. There are express buses into Bristol from many areas; many people travel with young children on buses; the Zoo could run its own buses on peak days and they would not have to accommodate everyone. The Massive Attack concert on the Downs in September 2016 made use of special services provided by First Bus. Special buses run from Temple Meads and the Centre for the Balloon Fiesta. (In addition, the no.505 service has been overlooked: it is not solely a Park and Ride service.)

7.40 The transport statement acknowledges (para 8.5.6) that council highways officers have said that the zoo does not provide enough incentives to encourage visitors to travel by alternatives to the car. In subsequent paragraphs (8.5.8 to 8.5.12) the statement looks at what other attractions in and around Bristol offer. None offers any incentives apart from discounts to visitors arriving by the tourist bus.

Our comment: the zoo has missed the point. They have been granted temporary planning permissions for a use contrary to the development plan on the basis that they will reduce the number of visitors' cars speedily. None of the other attractions is seeking to use an area of public open space as a car park. Nor are any of the other attractions causing travel chaos.

7.41. The zoo is not planning to offer any additional incentives. It concludes (para 8.5.6) that "regardless of the number of incentives provided and the level of promotion of these it is insufficient to overcome visitors' requirement for convenience when visiting BZG."

Our view of the zoo's incentives for public transport, walking and cycling: the zoo has done very little and plans to do no more. Its attitude is unnecessarily defeatist. Visitor surveys have shown that more visitors would take advantage of the existing incentives if they knew about them and additional incentives would attract more people. On peak days the zoo could run special bus services, as other events do.

(4) Charging more for admission and parking

7.42. The zoo could reduce the number of visitors' cars both throughout the year and at peak times by raising the prices of admission and parking. The Pinnacle report made a brief mention of parking charges and the council's travel plan officer suggested raising some in her report in 2013. Otherwise charging does not appear to have been explored recently.

Admission charges

7.43 In the 1980s the zoo charged more for admission in the summer than in the winter. This differential was dropped many years ago. The zoo has run a number of special promotions since, often to attract more people at what are already peak times. The offer of half-price tickets throughout August 2015 showed that demand is very price-elastic: over 10,000 tickets were sold in a few days. This brought traffic chaos.

7.44 The zoo could even out the flow of visitors by doubling the price of admission on the peak Bank Holiday days, when there are more than 5000 visitors. This would have the further advantage of improving the visitor experience on those days. It could introduce further differentials, charging higher prices at all Bank Holidays and throughout the school holidays.

Our view of admission charges: the zoo needs to introduce differential admission charges so that it does not attract more visitors in cars than can be easily accommodated.

Parking charges

7.45. The zoo's parking charges have always been low. Until 2008 they charged non-members £2 and members nothing. Criticised by objectors, they raised charges to £3 for non-members and £1 for members in 2009. There has been no increase since then.

7.46. In her 2013 report, the council's travel plan officer suggested that the cost of parking at the Ladies Mile site could be increased to become a deterrent, to encourage the use of a Portway Park & Ride service. She recognised, however, that this might also increase on-road parking. She was

highly critical of the concession to members, which she described as ‘totally alien to the zoo’s conservation vision’.

7.47. Since 2013, the Residents Parking Scheme has been introduced in Clifton and parking restrictions have been imposed on the Downs. This means that zoo visitors – particularly members - benefit from the cheapest and most generous parking in the city. Zoo members can park all day for £1: they do not have to visit the zoo but can walk or get a bus to Clifton or the centre. Non-members can park all day for £3. At parking meters nearby, people can park for 5 hours for £1 an hour, compared with three hours elsewhere in Clifton and shorter periods with higher charges elsewhere.

7.48. At London Zoo, which has a similarly urban site, charges are usually £14.50. This allows the zoo to offer special discounts when it has few visitors: parking is currently free until the end of March except in school holidays.

Our view of parking charges: the zoo’s charges are absurdly low compared with those elsewhere in the city. Charges need to be set high enough to provide an incentive to use other means of travel and to prevent people parking at the zoo to go elsewhere. Differential charges could be used to deter visitors at peak times and to attract them when there are spaces in the zoo’s car parks.

(5) Publicity

7.49. Websites and social media have transformed communications. The zoo knows this: it ran a Groupon offer which sold over 10,000 extra tickets in August 2015; in 2016 it drew a capacity crowd for a *Pokemon Go* event. Surveys show that the zoo’s promotion of travel incentives, Park & Ride, and public transport has, however, been ineffectual.

Our comment: there is little to publicise at present but there is no doubt more could be done if more were happening.

7.50. Technology can equally well be used to deter people from bringing cars. Nearly 30,000 people attended the Massive Attack on the Downs in September 2016. They were told not to drive and they didn’t: they walked or came in special buses.

Our comment: the zoo could easily deter people from driving to the zoo if it wished to do so. It could make it clear that parking was not available and describe the alternatives.

Our view on publicity: the zoo has the skills to both attract and deter visitors.

(6) A combined approach

7.51. Both Pinnacle and the Peter Evans Partnership, the zoo’s present transport consultants, looked at each of the alternatives to the use of the Ladies Mile site in isolation. They rejected them on the basis that none alone would deal with the peak demand at Ladies Mile. ***Our comment: this is not a valid approach. As the Pinnacle report recognised, a range of options can be combined, including measures to reduce overall demand at peak times if it cannot be accommodated.***

7.52. It would be for the zoo to decide which options to adopt. The main possibilities include:

- Increase admission and parking charges on the peak Bank Holidays to reduce the number of visitors significantly.
- Increase admission and parking charges at other peak times to reduce the number of visitors to manageable numbers.

- Increase financial incentives to use public transport and to cycle.
- Run special zoo buses from the Portway Park and Ride and from Clifton Down and Temple Meads stations.
- Develop the Zoo's West car park to accommodate any residual parking requirements.

7.53. Whatever options the zoo adopts would need to be well-publicised on its web-site and social media.

Our view of a combined approach: there seems no reason why a combination of the measures described above (or similar) should not only eliminate the need for the Ladies Mile site but also reduce parking by zoo visitors' cars on the Downs.

VIII Consequences of refusal

(1) Traffic chaos

8.1. Councillors have given temporary permissions grudgingly for fear of the traffic consequences of refusal. Experience since 2013 shows that these fears are without foundation because:

- **The zoo creates traffic chaos anyway.** It could not be worse than in August 2015 when half-price tickets were offered and on fine Bank Holidays when the Ladies Mile site is too wet to be used, as on Good Friday 2016.
- **The zoo would take steps to avoid continuing chaos.** The possibility of the Ladies Mile site being in operation lures visitors on to the Downs. Few people experience the Good Friday type chaos. If this happened regularly the zoo would, as its application recognises, lose visitors – and become very unpopular with people in Bristol. There are alternatives that the zoo can introduce rapidly, as described above.

(2) Displacement on to Downs roads

8.2. There is a risk, as the council's travel plan officer recognised in 2013, that the cars now parking on the Ladies Mile site would park on the roads on the Downs instead. Many zoo members already park there to avoid charges but that is not a problem: most park for relatively short periods and not at peak times. The main users of the Ladies Mile site are on day trips from South Wales and elsewhere outside Bristol: their use of Downs roads can be prevented by the zoo making it clear that parking is very limited and not drawing attention to that possibility. There are alternatives the zoo can advertise instead. ***If on-road parking becomes a problem, the council has powers to limit it both on the Downs and on the roads nearer the zoo. It is not clear why the generous five hour and Bank Holiday concessions were allowed.***

Our view of the consequences of refusal: there should not be any traffic problems if the zoo publicises the lack of parking and the alternatives effectively. If it does not, any problems are likely to be short-lived. The council has powers to prevent excessive use of on-road parking.

IX Planning and transport policies

9.1. The zoo claims repeatedly in its application that visitors' travel by car to the zoo is sustainable because there is a high average occupancy rate. For Park and Ride it highlights the carbon emissions from empty buses. The zoo sees no need to reduce car travel because it is more sustainable.

9.2 This is a distortion of both national and local planning and transport policies, which seek to reduce car use. Zoo visitors are generating significant carbon emissions and having other adverse environmental consequences by occupying the Downs site. They have been coming from ever-increasing distances.

9.3 A summary of the relevant planning and transport policies is in the annex. (Policies to protect the Downs for recreation and wildlife are – or will be – covered in other objections.)

Our view of transport policies: national and local transport policies do not support the zoo's claim that shared car use should be encouraged. There are firm commitments to reducing car use nationally and locally.

X Conclusions

10.1 This is a sorry saga of inaction over the last twenty years. The zoo is no nearer ending its use of the Ladies Mile car park voluntarily than it was in 1997 when the council first required it to submit a planning application. For surrounding areas and the Downs, the impact of zoo traffic is greater than it was then as zoo visitors have taken over parking spaces from which commuters have been banished. Plenty of paper has been produced in the form of travel plans that have missed their targets and in wordy planning applications. Empty promises have been made to end parking. Councillors have attached conditions to planning permissions and issued ultimatums: these have either been ignored or had no effect. The zoo now says there is no practical alternative to parking on the Ladies Mile site and it certainly has no intention of providing one.

10.2. ***This cannot go on.*** The zoo attracts about 600,000 visitors a year. 80% came by car in 2016, with an average occupancy rate of 3.8 ie over 126,000 cars. On a peak day, there can be 5,500 visitors ie at least 1,160 cars (probably more as many people come on long day trips on peak days). Parking on the Ladies Mile site contravenes the development plan and other policies intended to protect the Downs. Encouraging people to drive long distances contravenes national and local transport policies. ***Planning permission needs to be refused now. Only then will the zoo take action to attract only the number of visitors that can be accommodated without causing traffic chaos and intruding on the local environment.***

Downs for People

23 January 2017

Annex: planning and transport policies

(1) National Planning Policy Framework

1.1 The National Planning Policy Framework sets out the national planning requirements within which distinctive local development plans are to be set. The introduction emphasises (para2) that “applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”. It emphasises (para3) that national policy statements [on issues such as transport] are a material consideration.

The zoo’s case for continued car travel

1.2 The zoo’s consultants argue in section 6 of their transport statement that the zoo’s planning application is consistent with both the National Planning Policy Framework and the local development plan because car sharing is included in the definition of sustainable transport in the glossary at Annex 2 of the Framework. This definition reads: ‘Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport’. The consultants also quote the guidance in Section 4 para 32 that: “Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”.

Our comments: the zoo’s consultants seem to have lost the plot. The planning application is about the use of important public green space as a car park, not for a development where parking is ancillary. The National Planning Policy Framework and the local development plan make it clear that such green spaces should be fully protected and available for all to enjoy (we will set out these policies in detail in another analysis).

Planning committees have been in no doubt that the impact of parking is so severe that a permanent permission would be inappropriate. They have given temporary permissions only on the understanding that the zoo will reduce the number of cars speedily. Now there is no prospect of that, the application should be refused.

The numbers in a car and the sustainability of car sharing are irrelevant: the use of the site as a bicycle store for an attraction elsewhere would also be inappropriate, although the overall environmental harm would be less.

1.3 The consultants’ arguments would be more appropriate if the application was for the zoo itself. Given the number of cars it attracts and their impact, it is doubtful whether it would get planning permission today.

Other National Planning Policy Framework transport policies

1.4 The Framework contains relevant guidance on transport as follows:

- the planning system should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”. (*One of twelve core principles, para 17*).
- encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion (*para 30*)
- developments should be located and designed where practical to ...give priority to pedestrian and cycle movements, and have access to high quality public transport facilities (*para 35*).

(2) Bristol Development Framework Core Strategy

2.1 The Bristol Development Framework Core Strategy is a key part of the local development plan. The overarching issue is “*Ensuring a sustainable future for Bristol*”. (Page 13). Commitments include: “8. Enabling development in leisure, sport, culture and tourism within existing communities and in new development to give greater opportunity for locally based activities thereby reducing the need to travel.” (Page 14)

2.2 Key transport policies are set out below:

Policy BCS 10

Development Principles

Without prejudice to the implementation of the major transport schemes listed above, proposals will be determined and schemes will be designed to reflect the following transport user priorities as set out in the Joint Local Transport Plan:

- a) The pedestrian;
- b) The cyclist;
- c) Public transport;
- d) Access for commercial vehicles;
- e) Short stay visitors by car;
- f) The private car.

....

Development proposals should be located where sustainable travel patterns can be achieved, with more intensive, higher density mixed use development at accessible centres and along or close to main public transport routes. Proposals should minimise the need to travel, especially by private car, and maximise opportunities for the use of walking, cycling and public transport.

Developments should 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.

Proposals should create places and streets where traffic and other activities are integrated and where buildings, spaces and the needs of people shape the area.

(Page 82)

Policy BCS13

Development should contribute to both mitigating and adapting to climate change, and to meeting targets to reduce carbon dioxide emissions.

Development should mitigate climate change through measures including:....patterns of development which encourage walking, cycling and the use of public transport instead of journeys by private car.

(3) National and local transport policies

3.1 National and local transport policies highlight the undesirable impact of car travel on carbon emissions, air quality, and noise. Key documents include: the 2008 Department for Transport report

Delivering a Sustainable Transport System; the 2009 Transport White Paper *Low Carbon Transport: A Greener Future*; and the *West of England Joint Local Transport Plan 3 2011-2026*. They seek to promote lower carbon travel choices by better public transport, encouraging walking and cycling, and reducing the need to travel.

2008 Department for Transport report: Delivering a Sustainable Transport System

3.2 This report has five goals, including:

- “to reduce transport’s emissions of carbon dioxide and other greenhouse gases, with the desired outcome of tackling climate change; and
- to improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.”

2009 Transport White Paper Low Carbon Transport: A Greener Future

3.3 This White Paper spelt out how the Government intended to promote lower carbon choices, by, for example, better public transport, encouraging walking and cycling and reducing the need for travel.

The West of England Joint Local Transport Plan 3: 2011-2026

3. 4 This plan reflects national policy. It has five goals, including to:

- reduce carbon emissions
- improve quality of life and a healthy natural environment. (para 2.2,page 6)

To reduce carbon emissions, it focuses on “the promotion of lower carbon travel choices, providing alternatives to the car, influencing travel behaviour ... and managing demand.” (pages 43 and 51)

Box 5a: Bristol City Council target

In November 2009 Bristol City Council adopted a target to reduce CO₂ emissions by 40% by 2020 from a 2005 baseline. In February 2010 the Council adopted a Climate Change and Energy Security Framework which sets out how they will work with partners to deliver this target. The framework also includes energy and resilience targets for Bristol’s road transport, business/public sector and homes, with clear accountabilities and monitoring.

The City Council proposes that each sector will reduce emissions by 25% by 2015 and 40% by 2020 at a steady rate of change. Whilst reducing congestion and managing traffic flow will deliver some carbon benefits, it is recognised that achievement of the 40% target for transport will require a reduction in car-based trips within the urban area. (Page 46).

To improve people’s quality of life, the plan “seeks to enhance the public realm, minimise the impact of transport on the natural and historic environment, reduce the number of people exposed to high levels of transport noise and enhance our streetscape, public spaces and urban environment” (page 101).

Our comment: zoo parking on the Downs contravenes all these policies.

(4) Bristol City Council Action

Carbon emissions

4.1 As highlighted in the box from the transport plan above, in 2009 Bristol City Council adopted a target to reduce CO₂ emissions by 40% by 2020. It was recognised that this would require a reduction of car-based trips within the urban area.

4.2 Zoo parking on the Downs adds to carbon emissions, with visitor travel accounting for most of the zoo's significant carbon footprint. The zoo's travel surveys in 2013 suggested that the carbon emissions associated with visitor trips increased from 949.8tCO₂ in 2010 to 1477tCO₂ in 2012. The visitor travel target at para 6.3.1 of the travel plan submitted with the current application gives a 2013 baseline of 3987.5tCO₂ associated with visitor trips. The target for 2016 was to achieve a reduction of 7.5%. No figures are given but para 6.3.10 implies that the target was not met.

Our comment: carbon emissions associated with visitor travel to the zoo appear to have increased fourfold since 2010, presumably reflecting the greater distances travelled by visitors. The zoo needs either to return to being a more local facility or find ways of encouraging less environmentally harmful long-distance travel.

Sustainable travel initiatives

4.3 The council has done much to reduce the number of cars coming into the city and to facilitate alternatives. Bristol benefited from the Government's £560 million Local Sustainable Transport Fund which helped local authorities do more to encourage walking and cycling, improve public transport and make better connections between different forms of sustainable transport. Car-free Sundays have been introduced and residents' parking zones extended, including round the zoo.

Our comment: allowing the zoo to continue to attract about 126,000 cars a year is contrary to all these initiatives. Far from being car-free, the Downs are 'car-full' of zoo visitors' cars on sunny Sundays. Both on the roads on the Downs and in the adjacent Residents Parking Zones, zoo visitors have replaced commuters.

Downs for People

The Durdham Downs are for people, not for cars.

Application 16/06311/X: zoo parking off Ladies Mile

Objection 3: financial and economic

Downs for People is an informal organisation set up in 2013 to co-ordinate action to stop Bristol Zoo parking on the Downs. We want all the people of Bristol to enjoy all the Downs, all year round.

Summary

1. Planning is concerned with ensuring land is used in the public interest, not with protecting the private interests of applicants. Planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. The use of the Downs as a car park is contrary to the development plan. Temporary permissions have been granted in the past on traffic grounds. The financial impact on the zoo and the city have not been considered significant material considerations.
2. The zoo has made financial and economic claims which are not soundly based:
 - **£500k loss in zoo income from loss of the Downs car park.** This takes no account (para 4.2 below) of: non-paying visitors; that most users of the car park would still come; and that there are attractive alternatives. ***The losses would be about £100k (para 4.3) if the zoo offered no alternatives.***
 - **£2 million loss to the city from loss of car park.** This is based (para 5.4) on mis-using a figure for the average spend on a **visit** to Bristol as spend **per visitor**. The figure should not be applied to individual attractions anyway. In practice, most zoo visitors will still come; not all will pay for admission; and hardly any zoo visitors spend money elsewhere in Bristol (paras 5.6 to 5.12). ***The impact on the city would be negligible.***
 - **the zoo is Bristol's most popular visitor attraction.** Not according to surveys (paras 6.3 and 6.4). The zoo *can* claim to be Bristol's single 'biggest paid for destination'. Many more people visit the Harbourside attractions collectively.
 - **zoo visitors benefit the local economy by over £18.6 million a year, more than £51k a day.** It is not clear how these figures have been calculated (para 6.5). They are probably based, like the £2million figure, on the mis-application of a figure **per visit** as a figure **per visitor**. Most zoo visitors do not spend money elsewhere in Bristol. ***The zoo's contribution to the local economy is the portion of its £6.6million expenditure that is spent in Bristol.***
 - **there are additional benefits from employing staff and buying goods and services locally.** No, there are not. ***These are included in the zoo's £6.6 million expenditure on the zoo. Loss of income from the Downs car park would anyway not significantly affect the zoo's employment or spending levels.***

- **the zoo is hugely important to the city's tourist economy.** With 200 staff compared to 109,000 jobs in the city centre, the Zoological Society is a minor player economically (para 6.9). The city's planning policies for tourism focus on locally-based activities which reduce the need to travel and on regionally -important facilities in the city centre (paras 6.10 and 6.11). ***Tourism generally and the zoo in particular are not a huge part of Bristol's economy. Encouraging people to drive long distances – as the zoo does - is contrary to the city's planning policies for tourism.***
- **the Zoological Society relies on public support to fund conservation and research projects worldwide.** Not a material planning consideration. In any case, the society spends only a modest amount on these projects, most of it funded from 'restricted funds', not admission charges (para 7.3). ***The zoo seems unlikely to reduce this work.***

3. The zoo's claims are inaccurate and irrelevant. It has exaggerated both the importance of the Downs parking and the zoo's importance to the city. The zoo's finances are healthy: the loss of Downs parking would pose no threat to the viability of this much-loved visitor attraction and local amenity.

The financial and economic issues raised by the zoo in its application and public lobbying should not be considered material considerations when determining the application.

I. Introduction

1.1. In December Downs for People submitted its initial reactions to the zoo's application to continue to use the Downs as its biggest car park. We said that we would submit more detailed objections later. This is the second of our analyses, dealing with financial and economic issues. (The first dealt with transport and travel). We expect to submit at least one more, dealing with the impact on the Downs.

History

1.2. Planning law requires that "applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise" (*National Planning Policy Framework, page 1*). Zoo parking on the Downs contravenes so many development plan policies that planning committees have always been clear that a permanent permission would be inappropriate. They have given six temporary permissions in order to prevent traffic chaos, on the understanding that parking would be brought to a speedy end. Financial and economic issues have not been a significant material consideration. While the zoo has repeatedly claimed that both it and the city would suffer financial loss, it has not produced supporting evidence. In 2013 the planning officer advised councillors that no more than limited weight could be attached to the zoo's unsubstantiated claims.

Principles

1.3. The planning system is concerned with determining the use of land – in this case part of the Downs – in the public interest. It is **not** concerned with the merits or private interests of the potential user.¹ The applicant's personal circumstances and business competitiveness are not

¹ See <https://www.gov.uk/guidance/determining-a-planning-application>.

usually material planning considerations. ²For financial and economic issues to be relevant, the zoo would need to show the loss of the Downs parking would have a financial and/or economic impact that **was** a material planning consideration.

II Contents

2.1. This paper examines:

- the zoo's finances
- the impact on the zoo of the loss of the Downs car park
- the impact on the city of the loss of the Downs car park
- the zoo's economic importance to Bristol
- the impact on the world of the loss of the Downs car park.

III The zoo's finances

3.1 Bristol Zoological Society operates the zoo. In its statement accompanying the planning application, the Society stressed that the zoo was completely self-financing: profits were always invested back into saving wildlife and enhancing the experience for the visitor.

3.2 We have looked at the Society's accounts for 2015. ³ These show that the Society had a total income of £9.6 million in 2015, of which £6.3 million was attributed to the zoo (excluding commercial trading). The Society's total expenditure was £9.5 million, £6.6 million on the zoo. £551k was spent on conservation and research projects, of which £393k came from restricted funds such as grants.

3.3 The accounts do not show exactly how much the zoo makes from parking. There is a figure of £643k for 'other income' which covers 'car parks, education fees, vet consultancy etc.'. In our analysis of travel and transport issues we estimated that the zoo was making a profit of about £100k a year on the North car park and over £20k on the one on the Downs. (The Downs Committee appears to charge very little for the licences to use these sites).

3.4 The accounts show an organisation with a strong balance sheet:

- total income up 6.7% in the year
- large asset value of land and buildings
- little debt
- investment property and listed investments worth over £5m
- a defined benefit staff pension fund in surplus (very rare; most defined benefit pension funds are in deficit).

Our view of the zoo's finances: very healthy.

² See <http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf>.

³ At <http://www.bristolzoo.org.uk/zoo-information/about-us/accounts-reviews-and-plans>.

IV. The impact on the zoo of the loss of the Downs car park

4.1 The Zoological Society's statement accompanying the planning application says that loss of the Downs car park would result in a "huge financial loss to the Zoo - £500k in income each year". There is no explanation of this figure. We understand it is based on the total number of visitors using the car park multiplied by the cost of admission. For 2015 this would have been:

38 (number of days) x 343 (average number of cars) x 3.8 (average car occupancy) = 49,530 visitors.

The 2015 accounts say average admission per head was £10.36. ***On this basis, the loss would be £513k.***

4.2 But this figure takes no account of three factors:

- **many users of the Downs car park do not pay for admission.** The zoo's latest accounts show only 72% of visitors paid. (The zoo has over 20,000 members who pay an annual subscription, not for each admission).
- **most of the users of the Downs car park would visit the zoo if the car park were not available.** A survey for the zoo by Pinnacle consultants in 2009 found that 83% would still come.
- **the zoo can provide attractive alternatives.** We described the main ones in our analysis of the transport and travel issues. Last year's survey of zoo visitors found that 54% of those coming by car would consider Park & Ride, 27% train travel, 24% bus and 9% bike with the existing discounted offers, even when the car park was available. The Pinnacle study in 2009 showed a Park and Ride service from the Portway could take 63% of zoo visitors at peak times. For those who must come by car, the zoo could develop its West car park.

4.3. Applying the 72% and 83% figures to the zoo's estimated loss of £513k reduces it to a £63k loss. This is for admission fees only. Including the average spend per visitor (paying and non-paying) of £2.50 on catering and £2.23 on retail, increases the potential losses of income to £102k. These losses would not occur if the zoo provided attractive alternatives. If they did occur, it would be the equivalent of a loss of about 1% of the Zoological Society's income, which could be recouped by charging each paying guest about 25p more.

Our view of the impact on the zoo: much less than the £500k claimed. Could be about £100k if the zoo took no action to provide alternatives. There is no threat to the zoo's viability – the money could be recouped through a modest increase in admission fees and is about 1% of the zoo's income.

V The impact on the city of the loss of the Downs car park

(1) The zoo's claim: a £2million loss

5.1 The zoo has lobbied its members and other potential supporters of Downs parking as follows:

"Bristol Zoo is the most popular visitor attraction in the city but if people cannot park they will be discouraged from visiting not just the Zoo but the city. ***Our economic contribution to the city of Bristol would decrease by over £2million without this parking option.***"

5.2 Dr Bryan Carroll, CEO of the zoo, explained how they had calculated the £2 million decrease:

"The average spend per visitor is £42.39, which when multiplied by the visitors who used Ladies Mile in 2015 (343 cars x 3.8 pax per car x 38 days = 49,529) = £2,099,542"

(2) Errors in the £2million calculation

5.3 The zoo's calculation contains four major errors as set out below. ***The city does not gain £2million from the use of the Ladies Mile car park: the impact on the rest of the city from its loss would be negligible.***

Error1: mis-use of Great Britain Day Visits Survey data

5.4 The zoo has taken the figure of £42.39 for the average cost of a visit to Bristol from the Great Britain Day Visits Survey⁴

But the £42.39 spend is not per visitor but per trip ie per car in this case. The figure should not have been multiplied by average car occupancy. ***The zoo's result is about four times higher than it should have been.***

5.5 There are other problems in using data from the Day Visits Survey. The survey covers a huge range of activities from visiting friends and family (almost cost-free) to special shopping trips (very expensive). Data for Bristol came from interviews with about 400 visitors over a three -year period. This data may be aggregated to give an average figure for spend in the city but cannot be disaggregated to give a reliable figure for one attraction.

Errors 2 and 3: assumptions that everyone pays and everyone stops visiting

5.6 The zoo has assumed that all users of the car park are paying visitors and that none of them will visit if they cannot park there. As explained in para 4.2 above, only 72% of zoo visitors pay for admission and 83% of users of the Downs car park say they will still come if it is not available.

Downs for People calculation of income loss

5.7 We have taken key statistics from the zoo's 2015 annual accounts to calculate revenue from the Ladies Mile car park:

- Total guest numbers - 545,722
- Paid attendance* - 394,336
- Percentage of paying guests* - 72%
- Admission income per head - £10.36
- Day visitor catering spend per head - £2.50
- Retail spend per head - £2.23
- Total spend per paying guest - £15.09
- Total spend per car for paying guests (assuming 3.8 passengers a car) - £57.34
- Total spend per non-paying guest - £4.73
- Total spend per car for non-paying guests (assuming 3.8 passengers a car) - £17.97

*The zoo has over 20,000 members who pay an annual subscription, not for individual visits.

⁴ See <https://www.visitbritain.org/gb-day-visits-survey-latest-results> .

5.8 **Using these figures gives a total spend at the zoo by users of the Downs car park in 2015 of £603,692 (£538,122 from paying guests and £65,596 from non-paying guests).**

5.9 As already explained in para 4.2 above, surveys undertaken by Pinnacle Transportation for the zoo in August 2009 showed that 83% of the users of the Downs car park would still come to the zoo if the car park were not available. **This means the zoo's potential loss of income is 17% of £603,692 = £102,627.**

Error 4: assumption that all zoo visitors spend money elsewhere in Bristol

5.10 The zoo claims that the city as a whole benefits from its visitors because it wrongly assumes that every visitor to the city spends an average of £42.39 (para 5.4 above). Hence a carload of zoo visitors would spend £161, only £57 of it at the zoo (our figure in para 5.7 above). **But the £42.39 figure is per visit, not per visitor (para 5.4).** A trip to the zoo costs £15 more than the average trip to Bristol without any expenditure elsewhere.

5.11 **In practice, zoo visitors in general and those using the Downs car park in particular do not spend any money elsewhere in Bristol as part of their visit.** The zoo's 2016 travel survey showed 64% of visitors were on day visits and 24% lived locally. Only 6% were staying in the area, probably many with family and friends. 26% of visitors came from South Wales. (Para 5.1.9 of the travel plan submitted with the zoo's planning application).

5.12 Because it opens after the other two car parks are full, the Downs car park has a particularly high proportion of users on long day trips. The Pinnacle surveys around the August bank holiday weekend 2009 showed more users of the Downs car park came from outside Bristol than the average (73%) for all visitors to the zoo. 91% travelled from outside Bristol on Thursday, 86% on Saturday, and 88% on Monday. The peak time for arrivals was 11am to 12.30pm. The average length of stay was about 4 hours [the zoo says it is now 5 hours].

Our view on the impact of the loss of Downs parking on the city: negligible. Most users of the Downs car park are on day trips from places such as South Wales. They arrive late morning, visit the zoo for about five hours, and return home without spending more money in Bristol.

VI The zoo's economic importance to Bristol

(1) The zoo's claims

6.1 The zoo has made four claims about its economic importance to Bristol:

- 1) it is the most popular visitor attraction⁵
- 2) zoo visitors benefit the local economy by more than £51,000 a day and over £18.6 million a year⁶
- 3) the zoo's contribution to the city is greater than this because these figures do not take account of "factors such that we employ 200 local people and procure local businesses, supplying numerous services".⁷
- 4) the zoo is hugely important to the city's tourism economy.⁸

6.2 **None of these claims is true, as explained below.**

⁵ Lobbying to potential supporters.

⁶ Page 4 of Zoological Society statement accompanying application.

⁷ Zoo's director of estates in the Bristol Post, 3 February 2017.

⁸ Page 4 of Zoological Society statement accompanying application.

(2) Popularity of Bristol's visitor attractions

6.3 By many measures, Bristol Zoo is not the city's most popular visitor attraction. It is no. 13 on Tripadvisor⁹. The SS Great Britain and the Suspension Bridge are the top scorers, with the City Docks and most of the city's major landmarks and museums ahead of the zoo. It is not highlighted on the Visit Bristol website.¹⁰ That site's home page suggests Bristol is all about the Bs – Brunel, boats, bridges, bikes and beautiful countryside. The page has a photo of Noah's Ark Farm Zoo, not Bristol Zoo.

6.4 In terms of visitor numbers, the Suspension Bridge and Harbourside will attract many more visitors than the zoo but the numbers are not recorded. Where visitors are counted, the top ten attractions in the West of England are listed in the table below, with those in Bristol highlighted.

Table: Major Attractions in the West of England			
Attraction	Local Authority	Free/Paid admission	Annual Visits (2011)
Grand Pier, Weston Super Mare	North Somerset	F	3,000,000
Roman Baths	Bath & NE Somerset	P	975,096
M Shed	Bristol	F	640,000***
Arncliffe	Bristol	F	460,000***
Bristol City Museum & Art Gallery	Bristol	F	430,000***
Watershed	Bristol	F	420,000***
Bristol Zoo Gardens	Bristol	P	560,000***
Bath Abbey	Bath & NE Somerset	F	394,387
@Bristol	Bristol	P	170,000***
Brunel's SS Great Britain	Bristol	P	160,000***
Bristol Aquarium	Bristol	P	140,000***
Dyrham Park	South Gloucestershire	P	135,920**
Noah's Ark Zoo Farm	North Somerset	P	138,116
Tyntesfield	North Somerset	P	218,551
Fashion Museum	Bath & NE Somerset	P	129,184
Victoria Art Gallery	Bath & NE Somerset	F	110,498
The Holburne Museum of Art	Bath & NE Somerset	F	110,105

Sources: *Annual Survey of Visits to Visitor Attractions, 2010, Visit England*¹¹; *Bath Tourism; Destination Bristol*;

*2009 figure ** 2010 figure *** (rounded)

⁹ See https://www.tripadvisor.co.uk/Attractions-g186220-Activities-Bristol_England.html).

¹⁰ <http://visitbristol.co.uk/things-to-do/attractions>

¹¹ <http://www.swfed.org.uk/news/most-visited-attractions-statistics-released-by-visit-england/>

According to the above data, M Shed is the most popular visitor attraction, and it is notable that the other Bristol attractions in this table are situated in fairly close proximity within the city centre.

More recent (although partial) information for 2015 is available from Visit England¹². This shows the M Shed to be still in the lead with visitor numbers of 550,00 but the zoo is only slightly behind at 546,000. Both have reduced visitor numbers compared to 2011.

Our view of the zoo's ranking: the zoo is not the most popular visitor attraction in Bristol. Its less frequent claim to be the single "biggest paid-for destination in Bristol" is correct.¹³ Many more people visit the Harbourside attractions collectively.

(3) Errors in the daily and annual contribution calculations

6.5 The zoo has not explained the basis of its daily (£51k) and annual (£18.6million) figures for zoo visitors' benefits to the local economy. The two figures clearly have the same source: £18.6 million is a straightforward multiple of £51,000 (the zoo is open 364 days a year). Given the order of magnitude, these estimates are almost certainly derived - like the zoo's erroneous £2million calculation - from the Great Britain Day Visits figure of £42.39. £18.6 million from the 394,336 paying guests to the zoo in 2015 would mean each contributed £47.09 to the city.

6.6 ***These figures are no more credible than the £2million.*** As already explained in the analysis of that figure (paras 5.4 to 5.12), people on an average day trip to Bristol do not ***each*** spend over £40. They spend £42.39 ***together*** on a trip. Most of those visiting the zoo do not spend money anywhere else in Bristol as part of their trip (paras 5.13 and 5.14).

Our view of the zoo's total contribution to the city: the Zoological Society had an income of £6.3 million from the zoo in 2015 and spent £6.6 million on it. There is no additional or surplus income of the order of £18.6 million a year from zoo visitors to go elsewhere in the city. The total contribution is the portion of the £6.6million spent in Bristol.

(4) Additional benefits from employing staff and procuring goods and services from local businesses

6.7 Almost all the zoo's money comes from its visitors: it does not have a large separate income stream to pay for staff and supplies etc. The zoo and its staff may spend money in the city, but it is still the same money from visitors - it cannot be counted two or three times. That is, it is not ***additional*** to the £6.6 million expenditure on the zoo but part of it. The scale of the possible loss of income to the Zoo (para 5.9) is only in the region of £100,000, which would have negligible impact on the contribution of the zoo to the Bristol economy. It is not sufficient to significantly affect zoo employment or local spending levels.

Our view of the benefits to the city from the zoo's employment of staff and local business procurement: this is expenditure from the zoo's £6.3 million income from zoo visitors, not additional to it. The potential loss of income from the Downs car park would not significantly affect the zoo's employment or spending levels.

¹² [https://www.visitbritain.org/sites/default/files/vb-corporate/Documents-Library/documents/England-documents/most visited paid south west 2015.pdf](https://www.visitbritain.org/sites/default/files/vb-corporate/Documents-Library/documents/England-documents/most%20visited%20paid%20south%20west%202015.pdf)

¹³ Page 4 of Zoological Society statement accompanying application.

(5) The zoo in context: the city's economy and plans

6.8. The zoo claims to be 'a huge part of the city's tourist economy'.¹⁴ But tourism overall does not play a huge part in the city's economy and the zoo is a minor player.

6.9 The Bristol Zoological Society employed the equivalent of 163 full-time staff in 2015, 78 at the zoo. (The total average monthly headcount was 199.) With fewer than 250 staff and an annual turnover well below 50 million euros, it falls within the usual definition of an SME (Small and Medium-Sized Enterprise). It makes a very small contribution to Bristol's overall economy: 5000 people work at the Cabot Circus shopping centre alone. The Zoological Society's employees (199) are equivalent to just 0.18% of Bristol's city centre jobs (109,500).¹⁵

6.10 The *Bristol Development Framework Core Strategy* (2011) is a key part of the local development plan. It notes that the city has a varied economic base but makes no mention of tourism among its examples (page 11). The overarching issue is "*Ensuring a sustainable future for Bristol*". (Page 13). Commitments include: "Enabling development in leisure, sport, culture and tourism within existing communities and in new development to give greater opportunity for locally-based activities thereby reducing the need to travel." (Page 14). This is reflected in policy BCS 7 (page 63): "Retail development, offices, leisure and entertainment uses, arts, culture and tourism uses will be primarily located within or, where appropriate, adjoining the centres in the identified network and hierarchy serving Bristol."

6.11 The strategy's more specific ambitions for tourism are largely confined to the city centre. It says (page 19): "The city centre will have an enhanced cultural and tourism offer for residents and visitors with new regionally important facilities complementing the city's established venues and facilities". This is reflected in policy BCS2 (page 36): "Bristol City Centre's role as a regional centre will be promoted and strengthened. Development will include mixed uses for offices, residential, retail, leisure, tourism, entertainment and arts and cultural facilities." This policy has been developed further in the *Bristol Central Area Plan* (2015) which seeks (Policy BCAP9) more cultural facilities, tourist attractions and water-based recreation in the central area. It makes specific mention of the new arena.

6.12 There are no specific references to Bristol Zoo in the development plan, nor to encouraging more tourists to North West Bristol generally. The emphasis is on major tourist development in the city centre and *local* amenities elsewhere.

Our view of the zoo in the context of the city's economy and plans: the zoo is a small player economically. Planning policies for tourism in the city focus on locally-based activities which reduce the need to travel and on regionally-important facilities in the city centre. Bristol Zoo, which has been encouraging people to drive from ever-greater distances, does not conform with either policy.

VII The impact on the world of the loss of the Downs car park

7.1 The Zoological Society's letter in support of its planning application stresses that it is not just a visitor attraction but aims to save wildlife. Its 'conservation science efforts are carried out worldwide' and it gives examples. Its appeal to the public to support its planning application ends: "Bristol Zoological Society is a conservation and education charity and relies on the generous support of the public not only to fund its important work in the Zoo and at the Wild Place Project but

¹⁴ Page 4 of the Zoological Society's statement accompanying the application

¹⁵ Page 11 of Bristol Development Framework Core Strategy 2011

also its vital conservation and research projects spanning five continents”. It says it has established over 30 field conservation and research programmes all over the world in the course of its 180-year history.

7.2 The zoo’s charitable status and conservation work abroad are not material planning considerations. In any event, the zoo is again exaggerating its own importance. Its accounts show that in 2015 it spent only £551,000 on conservation and research projects. This modest sum contrasts with much greater expenditure by conservation organisations such as WWF-UK, which spent £34.6 million on conservation projects and £9.4 million on ‘community influencing and awareness’. Only £158k of the zoo’s spending came from its ‘unrestricted’ funds such as admission charges. The rest was from ‘restricted’ funds, such as grants, donations and legacies. **There is no reason why loss of the Downs car park should interfere significantly with this work.**

Our view of the impact on the zoo’s conservation work: given its high reliance on restricted funds, this seems an unlikely candidate for any cuts, should the zoo choose to make some. This is not anyway a material planning consideration.

VIII Conclusions

8.1 This analysis shows that the zoo has greatly exaggerated the impact of the loss of the Downs car park on its own finances and on the city’s economy. It has also exaggerated its importance to the city. The table below sets out the zoo’s claims and our findings.

<u>Item</u>	<u>Zoo’s claim</u>	<u>Our finding</u>	<u>Reason for difference</u>
Loss to zoo from planning refusal.	£500k (admission charges only)	£102k or less (all spending at the zoo).	Not all users pay and most will continue to come.
Loss to city	£2 million	Negligible	Zoo figure based on misapplied statistic. Car park users don’t spend anything elsewhere
Daily zoo contribution to city	£51k	Zoo gets an average of £18k a day in visitor spending. Negligible visitor expenditure elsewhere.	As above (we assume).
Annual zoo contribution to city	£18.6 million	Up to the total expenditure on the zoo of £6.6 million. Negligible visitor expenditure elsewhere.	As above (we assume).
Spending on staff and services	Unspecified additional contribution to city.	Zero.	Double-counting, Staff are funded from the zoo’s general income, mainly from visitors, and expenditure on them is included in the £6.6million.
Spending on conservation work	Implicitly threatened.	Highly unlikely to be affected.	Relatively little expenditure and mainly from ‘restricted’ funds not general income.

7.2 We find that the zoo's finances are generally healthy and that the loss of the car park would pose no threat to its viability. It could avoid financial losses altogether by providing visitors with attractive alternatives or by putting up its charges slightly.

7.3 The zoo is a much-loved visitor attraction and local amenity. But it is not of great *economic* importance to the city, nor is there anything in the city's development plan to suggest that it should be particularly encouraged or protected. ***The financial and economic issues raised by the zoo in its application and public lobbying should not be considered material considerations when determining the application.***

Downs for People

9 February 2017

Downs for People

The Durdham Downs are for people, not for cars.

Application 16/06311/X: zoo parking off Ladies Mile

Objection 4: the impact on the Downs

Downs for People is an informal organisation set up in 2013 to co-ordinate action to stop Bristol Zoo parking on the Downs. We want all the people of Bristol to enjoy all the Downs, all year round.

Summary

This analysis looks at the impact of zoo parking on the Downs. It considers how far parking is compatible with Bristol's development plan and other policies. This is critical because planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The analysis shows that the car park occupies a particularly attractive area of grassland, of great value for recreation and of conservation interest. Parking has an adverse effect on recreation, both on the site itself and over a wider area. Cars are visually intrusive, noisy and dangerous. Parking on the site has reduced its nature conservation interest, with bare earth, vehicle tracks and a decline in the quality of the grassland. The zoo ignores the environmental protocol agreed with the Council when it suits it to do so.

The Downs are protected by four planning designations: Important Open Space; Site of Nature Conservation Interest; Local Historic Park and Garden; and Conservation Area. There are development plan policies covering all these designations. Parking on the Downs is in clear contravention of them.

Parking on the Downs is also contrary to planning policies on walking and recreation and to numerous national and local policies on related issues.

Zoo parking on the Downs is clearly not in accordance with the development plan. It never has been: six planning committees have given temporary permissions only because they considered transport and travel issues a sufficient material consideration. We showed in a previous analysis that this is no longer the case. ***Planning permission should be refused.***

I. Introduction

1.1 In December Downs for People submitted its initial reactions to the zoo's application to continue to use the Downs as its biggest car park. We said that we would submit more detailed objections later. This is the third of our analyses, dealing with the impact of zoo parking on the Downs.

1.2 We are dealing with the impact on the Downs third because it is straightforward, not because it is unimportant. On the contrary, this is the main issue. Planning law requires that "applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise" (*National Planning Policy Framework, page 1*). Zoo parking on the Downs contravenes so many development plan policies that planning committees have always been clear that a permanent permission would be inappropriate. This analysis describes the contraventions.

1.3 The two analyses which Downs for People has already submitted dealt with transport and travel and with financial and economic issues. These are potential material considerations. Transport and travel issues have been the reason for granting temporary permissions in the past. Financial and economic issues have never been given much weight, because of lack of evidence to support the zoo's claims. Our two previous analyses showed why neither of these potential material considerations justifies granting planning permission now. ***This analysis sets out why permission should be refused.***

1 Contents

1.1 This paper examines:

- The importance of the site
 - The zoo's claims
 - Recreation
 - Landscape and tranquillity
 - Vegetation
- Impact of parking
 - Recreation
 - Landscape and tranquillity
 - Vegetation: the zoo's claims
 - Vegetation: the reality
- Contravention of national and local planning policies
- Contravention of national and local policies on related issue

1.2 The policy background is set out in detail in the annex.

III. The importance of the site

(1) The zoo's claims

3.1. Since its first planning application in 1998, the zoo has emphasised that the Downs car park is small and unimportant relative to the overall size of the Downs. Until the current application, the zoo has always said the site comprises 1.34 hectares, 0.7% of the total area of the Downs. The current application is for the same site but the Bristol Zoological Society, in their accompanying statement, has reduced the area to 1 hectare, a 25% reduction of almost an acre. It says a hectare – and hence the site - is less than half a per cent of the total area of the Downs. This claim has been repeated on the zoo's web-site and in numerous messages to its members and supporters.

Our comment: the zoo appears to have 'rounded down' the size of the site significantly for lobbying purposes. In any event, it is the quality of the site and the quality of the Downs as a whole that make it important (see below).

(2) Recreation

3.2. The Downs are extremely well used for a range of recreational activities, by Bristol residents and by visitors to the city. With the Avon Gorge and Clifton Suspension Bridge, they must rate as Bristol's greatest attraction. Many people walk or run on the Downs daily and in summer many spend much of their time there.

3.3. The site of the Zoo car park is on several routes which are popular with walkers and joggers. The site is particularly important because areas for carefree, uninterrupted walking are limited by other activities on the Downs. When not used as a zoo car park and when the after-effects of parking are not too severe, the site is popular for picnics, ball games and other leisure pursuits. It is flat, open and away from traffic, with fine views. Although parking has reduced its ecological interest, the grass at many times of the year is still attractive.

(2) Landscape and tranquillity

3.4. The Council's planning officers have emphasised the quality of the site in their advice on successive applications. Their first report, in April 1998, described the site's contribution to the Downs Conservation Area as follows:

"This area...has a more enclosed character due to low lying scrub dotted with mature trees and...as well as greater visual interest... has two distinctive and valuable qualities that are especially important in the heart of the City. The first is relative peace and quiet, to be enjoyed here at all times. Whilst Ladies Mile and the road past Sea Walls carry traffic, it is intermittent and [slow]. Hence both the acoustic and the visual intrusion of the cars is low. Nor is there the smell of exhaust fumes. This area of acoustic protection is ... fairly small. The second quality of this area is its strong sense of space, together with the visual enclosure and screening afforded by belts of woodland and individual shrubs and trees. There are striking and attractive vistas to the mountains of South Wales, and over Clifton landmarks, such as Christ Church and Clifton Cathedral, to the hills to the south of the city. The City is present in the view but most of it is screened by the margining trees and shrubs. The ground is gently undulating and broken up by clumps of trees and shrubs, this irregularity being a source of constant visual interest and variety.

.....whilst the Zoo points out that the car park takes up only 0.7% of the area of the Downs, it is considered that it is one of the most valuable areas for public enjoyment".

3.5 This assessment has been echoed and repeated in officers' advice on later applications.

(4) Vegetation

3.6 The car park is part of a Site of Nature Conservation Interest, the Clifton and Durdham Downs, of botanical interest for its grassland. The ecologist employed by the zoo to undertake annual vegetation surveys pointed out: "Unimproved grassland is the habitat of greatest nature conservation value on the Downs and is a Biodiversity Action Plan (BAP) priority habitat". As noted above, the grassland is particularly fine in this part of the Downs. Much is being done to increase the Downs' wildlife interest generally, with, for example, a wildflower meadow just across Ladies Mile from the zoo's car park and with goats in the Gully.

Our conclusion: this is a particularly attractive area of grassland, of great value for recreation and of conservation interest.

IV Impact of parking

(1) Recreation

4.1 When covered by cars, or cordoned off in anticipation of parking, the Downs site cannot be used for recreation. Parking makes some popular walking and jogging routes unusable and others unattractive. People do not want to negotiate a way through moving or parked cars, nor do they want to see, hear and smell them.

4.2 The Zoo's use of the Downs coincides with when people most want to be there: weekends and Bank Holidays from Easter to September and in the school holidays. Because the public is unclear about the Zoo's pattern of use – which is anyway unpredictable – some avoid the site for more than the number of days when parking is permitted and for longer hours than necessary.

(2) Landscape and tranquillity

4.3 The Council's planning officers noted in 1998 that: "the car park brings traffic, noise, fumes and visual intrusion into this area of public open space... during the period when the Downs is more likely to be used by the public. The parked cars are clearly visible from the north and west across Ladies' Mile, as well as from closer quarters, introducing an alien element into the attractive landscape of the Downs."

4.4 Nothing has changed since 1998 – the cars can be seen from far away and, because the site is high and exposed, have a significant impact. The zoo makes no attempt to clear the site of cars at 6.30pm so that parking – not only by zoo visitors – goes on longer than permitted.

4.5 It is not just the cars on the site itself that cause problems for other Downs users but also zoo traffic on surrounding roads. There is often congestion on Ladies Mile at the car park entrance, and significant numbers of cruising cars looking for parking when the car park is closed or full. In addition, surveys show that about a quarter of the zoo's visitors routinely park on surrounding residential streets and on the roads on the Downs. Parking on the roads on the Downs is visually intrusive and makes it more difficult to cross them. Cruising cars are similarly obtrusive and even more dangerous.

(3) Vegetation: the zoo's claims

4.6 The Zoological Society's statement accompanying the zoo's planning application notes that it has been required, under the terms of its planning permissions, to commission annual vegetation surveys. It claims these have found: "...there is no permanent damage caused to the land and no on-

going deterioration to the richness of the species and habitats of the area.” This claim has been much repeated in the zoo’s lobbying of its members and others in support of the application.

4.7. The Zoological Society’s statement also points out that it has agreed a parking protocol with the Council to ensure no harm. “This states that the area can only be used when the ground conditions are suitable and it requires parking layouts and the position of the entrance to be changed to avoid continuous wear and tear on certain areas”.

(4) Vegetation: the reality

4.8 In practice, the site of the car park shows two types of damage:

- bare earth and vehicle tracks all across the site and especially at the entrances
- decline in the quality of the grassland.

Bare earth and vehicle tracks

4.9 When considering the zoo’s first planning application in 1998, the Council’s planning officers noted that ‘the land has been used for parking for many years and shows signs of degradation in that the vehicular access points are worn bare, and bedrock and areas of soil are exposed within the parking area itself. Vehicular tracks are still visible from last year’.

4.10 Since 2006 the zoo has generally – but not always - commissioned annual vegetation monitoring surveys, as required under the terms of its planning permissions. The surveys have confirmed that visible damage continues, varying from year to year. In October 2012 the ecologist noted “more wear was evident ...than in previous years, probably a result of the exceptionally wet summer...Bare soil is generally limited to the area within 15 metres of the road but patches of bare ground mark the line of the westernmost, and most heavily used, track across the area.” The site did not recover over the winter: damage was still visible in March 2013.

4.11 Similarly, in December 2015 the annual survey found a marked increase in bare soil, which could have been because of the lateness of the survey. (The control area showed a similar increase, partly because of vehicular use - assumed unauthorised - in wet conditions.) On Good Friday 2016, the poor condition of the site and very wet conditions did not stop the zoo using it for parking hundreds of cars, contrary to the agreed protocol. This, together with further unauthorised vehicular use, made the site a waterlogged eyesore, unattractive for walking or any other activity, for the rest of the Easter holidays. The zoo filled the entrances with limestone chippings because of the damage.

4.12 As these examples show, the Downs car park is particularly unsuitable as the main zoo car park at Easter. This is a peak time for visitors but the car park is likely to be unfit to use. On Good Friday 2013, the weather was not good but the zoo’s permanent car parks were nonetheless full by 11.30am. Angry and anxious zoo visitors were left roaming the streets looking for somewhere to park. The Ladies Mile site was not used. On Good Friday 2016 the weather was fine. The site was not fit to use but the traffic chaos was such, with Bridge Valley Road blocked, that the zoo opened it anyway.

4.13 In relation to the current application, the council’s nature conservation officer visited the site in December 2016. He noted there were bare areas of soil near the road entrance from Ladies Mile and some prominent vehicle tracks on the grassland. He suggested “a more ecologically sustainable alternative long term solution instead of parking on this part of the Downs “.

Decline in the quality of the grassland

4.14 The zoo's consultant has also observed vegetation differences between the relatively undamaged (that is, still grass-covered) parts of the car park and surrounding areas. He has found that the vegetation in the car park is less lush than in neighbouring areas. Further, there is an increased frequency of species associated with disturbance and a reduced frequency of many species associated with unimproved grassland.

4.15 The consultant concludes that it is likely past parking caused a reduction in the nature conservation value of the grass sward. There has been no further deterioration since monitoring started in 2006. Remediation works might be undertaken if parking ends but not until then.

4.16 The Avon Wildlife Trust has expressed concern about this in its comments on the current application, saying: "... we are concerned about the damage to the Site of Nature Conservation Interest outlined in the Vegetation Monitoring Reports accompanying the application and the fact that this has not complied with the Council's policy on nature conservation over time. The latest report dated 2016 states that the composition of the vegetation has been broadly stable since 2006. However, it suggests that the use of the area for car parking caused, when the practice commenced, some decline in the nature conservation of the sward. It goes on to state that there is little that can be done to reverse this impact whilst occasional use as a car park continues."

Our conclusion: zoo parking has a major adverse impact on the recreational value not just of the car park site itself but of a wider area of the Downs. Cars are visually intrusive, noisy and dangerous. Parking has damaged the site, irreparably while it continues. The zoo's claim that there is no permanent damage is disingenuous when it has no plans to end its use of the site. The zoo ignores the agreed environmental protocol when it suits it to do so. The Ladies Mile site is particularly likely to be unfit for use at Easter, a peak period for zoo visitors.

V Contravention of national and local planning policies

Summary

5.1. Parking on the Downs is contrary to national and local planning policies on:

- green spaces, the natural environment and conservation areas;
- walking and other recreation;
- sustainability and travel by car.

These policies are intended to ensure that areas such as the Downs are protected; that enjoyment of them by local people is promoted; and that the impact of cars is kept to a minimum. Sustainability and transport policies were dealt with in our second objection on transport and travel issues. This analysis focuses on the first two.

5.2. Relevant policies are summarised in the sections that follow. The key documents are the *National Planning Policy Framework*; the *Bristol Development Framework Core Strategy*; and the *Site Allocations and Development Management Policies Local Plan*. Planning law requires that planning applications must be determined in accordance with the development plan, of which the last two documents are part, unless material considerations indicate otherwise. The *National Planning Policy Framework* is a material consideration in planning decisions. There are extracts from all three documents in the annex.

(1) Green spaces, the natural environment, and conservation areas

5.3 The *National Planning Policy Framework* contains strong commitments to protect natural and historic environments (details in annex). These commitments are reflected in policies in Bristol's development plan. The Downs are subject to four planning designations which should protect them: these are listed below together with the relevant policies from *the Bristol Development Core Strategy* (BCS numbers) and the *Site Allocations and Development Management Policies Local Plan* (DM numbers).

5.4 The four Downs designations are:

- **Important Open Space** (protected by policies BCS9 and DM17)
- **Site of Nature Conservation Interest** (policies BCS9 and DM 19)
- **Local Historic Park and Garden** (policies BCS 22 and DM 31)
- **Conservation Area** (policy BCS 22 and 31)

5.5 The full policies are in the annex. It is very clear that zoo parking on the Downs should not be permitted because:

- the parking is not ancillary to the open space use (DM17 policy for important open spaces)
- it harms the important landscape (DM17 on urban landscapes)
- it has a harmful impact on the nature conservation value (DM19 policy on Sites of Nature Conservation Interest)
- it does not preserve or enhance the Downs Conservation Area (DM31 policy on conservation areas)
- it has an adverse impact on the appearance of the Downs (DM31 policy on historic parks and gardens)

Our view: zoo parking is in clear contravention of all these very clear policies. Permission should be refused.

(2) Walking and other recreation

5.5 Both the *National Planning Policy Framework* and the *Bristol Development Framework Core Strategy* seek to improve health and well-being. They recognise the value of open spaces, sport and recreation. Both emphasise the requirement to meet *local* needs. Bristol's strategy emphasises the provision of facilities accessible by walking, cycling and public transport. 'This will help enable active lifestyles, improve quality of life, and reduce pollution.'

5.6 Parking on the Downs prevents local people enjoying them. It also makes it less likely that visitors to the Zoo will walk, cycle or use public transport.

Our view: zoo parking contravenes walking and recreation policies too.

VI Contravention of national and local policies on related issues

6.1 Other national and local policies on similar themes are material considerations. These are summarised in the following sections. Extracts from the key policy documents are in the annex.

(1) Green spaces and the natural environment

6.2 The Government's 2011 Natural Environment White Paper *The Natural Choice: securing the value of nature* contains the commitment to use the planning system to protect and enhance the

natural environment, subsequently reflected in the *National Planning Policy Framework*. It also emphasises the value of urban green spaces.

6.3. The Downs enjoy specific protection under the *Clifton and Durdham Downs (Bristol) Act 1861*. This is intended to safeguard them as ‘a place for the public resort and recreation of the people of Bristol’.

(2) Walking and other recreation

6.4 The 2011 Natural Environment White Paper stresses the economic and social benefits of green infrastructure. Everyone should be able to make the most of ‘nature’s health service’. It points out that this is a theme too of the 2010 Health White Paper *Healthy Lives, Healthy People: Our strategy for public health in England*, under which responsibilities for public health were transferred to local authorities in April 2013.

6.5. Local authorities were already promoting walking and other recreation in Bristol. The *West of England Joint Local Transport Plan 3 2011-2026* seeks, for example, to provide a safer environment for pedestrians and cyclists and to minimise the impact of transport on the natural and historic environment. Bristol City Council has a *Walking Strategy for Bristol: Our Vision for 2011-2021*. This aims to make walking - both for recreation and as a mode of travel - easier, safer and more pleasant, in ‘a city where people drive less and walk more’. Opportunities to walk in Bristol’s green spaces should be protected and enhanced.

6.6 Bristol also has a *Walk for Health* programme organised by *Active Bristol*. This supports Bristol’s diverse communities to become more active through walking. It encourages people of all ages and abilities to enjoy Bristol’s great outdoors. As the 2011 Natural Environment White Paper pointed out, the city’s Director of Public Health is ideally placed to expand such initiatives and to link the management of areas such as the Downs with public health benefits.

Our view: zoo parking on the Downs is inconsistent with all these policies.

VII Conclusions

7.1 It is clear why six planning committees have concluded that zoo parking on the Downs is contrary to the development plan and other policies, making a permanent permission inappropriate. They have given weight to transport and travel issues when granting temporary permissions.

7.2. Our first analysis showed why little weight should now be given to transport and travel issues.
Permission should therefore be refused.

Downs for People

24 February 2017

ANNEX: THE POLICY BACKGROUND

(This annex contains relevant extracts from the policies listed in sections V and VI of the main statement. Key planning policies for Bristol are highlighted.)

National and local planning policies (section V)

(1) Green spaces, the natural environment, and conservation areas

National Planning Policy Framework

“Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored.

Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers.” (Ministerial foreword)

Planning must perform “**an environmental role** – contributing to protecting and enhancing our natural, built and historic environment.” (para7)

“Planning should...

- contribute to conserving and enhancing the natural environment and reducing pollution;
 - conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.”
- (Twelve core planning principles, para17)

“The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
 - recognising the wider benefits of ecosystem services;
 - minimising impacts on biodiversity and providing net gains in biodiversity where possible....”
- (para109)

“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. The more important the asset, the greater the weight should be.” (para 132)

“Where a proposed development will lead to substantial harm to...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.” (para133)

Bristol Development Framework Core Strategy

Environment/physical issues identified include:

“10. Protecting and enhancing Bristol’s built and historic environment, ensuring high quality sustainable urban design and construction and attractive and better places and spaces throughout the city.

11. Protecting and enhancing the natural environment and ensuring best use is made of open spaces to meet the needs of residents and employees in the city.” (Page 14)

“A network of valuable open spaces, green infrastructure and wildlife habitats will be maintained and improved throughout the city.

Open spaces available to all will be improved.” (Page 22)

Strategic green infrastructure network

The Downs are part of the *strategic green infrastructure network*. (Page 79) The strategy recognises the value of this infrastructure to the quality of life in Bristol.

Policy BCS9

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...

Open Space

Open spaces which are important for recreation, leisure and community use, townscape and landscape quality and visual amenity will be protected.

Some areas of open space may be released, through the development plan process, for appropriate development where:

- They are no longer important for recreation, leisure and community use, townscape and landscape quality and visual amenity;
- Development of all or part of an open space would result in improved urban form or an enhancement to existing open space areas.

New development should incorporate, or contribute towards, the provision of an appropriate level and quality of open space.

Biological and Geological Conservation

Internationally important nature conservation sites are subject to statutory protection.

National and local sites of biological and geological conservation importance will be protected having regard to the hierarchy of designations and the potential for appropriate mitigation. The extent to which a development would contribute to the achievement of wider objectives of the Core Strategy will be carefully considered when assessing their impact on biological and geological conservation.

Where development would have an impact on the Bristol Wildlife Network it should ensure that the integrity of the network is maintained or strengthened.

Conservation area

The strategy also recognises the value of Bristol’s ‘rich and varied heritage’ and seeks to ensure that this is safeguarded and enhanced.

Policy BCS 22

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.

Site Allocations and Development Management Policies Local Plan

Green infrastructure

Pages 30 to 47 (policies DM15 to 20) of the Plan deal with green infrastructure, emphasising its importance for health, the environment and wildlife. The relevant parts of key policies are set out below.

Policy DM17: Development Involving Existing Green Infrastructure

Important Open Spaces

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.

Unidentified Open Spaces

Development which would result in the loss of open space which is locally important for recreation, leisure and community use, townscape and visual amenity will not be permitted.

Urban landscape [includes the Downs]

Proposals which would harm important features such as green hillsides, promontories, ridges, valleys, gorges, areas of substantial tree cover and distinctive manmade landscapes will not be permitted.

Policy DM19: Development and Nature Conservation

Development which would be likely to have any impact upon habitat, species or features which contribute to nature conservation in Bristol will be 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.

Where loss of nature conservation value would arise development will be expected to provide mitigation on-site and where this is not possible provide mitigation 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.

Sites of Nature Conservation Interest

Development which would have a harmful impact on the nature conservation value of a Site of Nature Conservation Interest will not be permitted.

Conservation Areas and Historic Parks and Gardens

Policy DM 31: Heritage Assets

Development that has an impact upon a heritage asset will be expected to conserve and, where appropriate, enhance the asset or its setting.

Conservation Areas:

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.

Registered Historic Parks and Gardens:

Development will be expected to have no adverse impact on the design, character, appearance or settings of registered historic parks and gardens and to safeguard those features which form an integral part of their character and appearance.

Downs Enhancement Statement 1981

In relation to the Downs Conservation Area, the Downs Enhancement Statement is another relevant planning document. It contains the following enhancement objectives relating to traffic, parking and landscape management:

GENERAL ENHANCEMENT OBJECTIVES

- (1) An environmental traffic management scheme, including provision for cyclists, needs to be prepared in conjunction with the Highway Authority. This should address the issue of over use of the peripheral routes to the Downs and encourage more protected pedestrian and cyclist movement through the spaces.
- (2) As part of the Management Scheme, a study should be prepared investigating the possibility of restricting vehicular use of the principal roads at certain times such as weekends and bank holidays.
- (4) The Downs Edge and its related gardens is particularly sensitive as it makes a significant contribution to the expansive and sylvan quality of the space. Any car parking which intrudes by being visible from the Downs and its related footpaths will be resisted. In this case, the City Council's Conservation Handbook Principle P33 will be applied.
- (5) Where conversion of large dwellinghouses into flats results in a significant increase in car parking provision and acts detrimentally to the quality of the open landscaping in the Conservation Area, it will be resisted.
- (8) A landscape management scheme needs to be prepared in conjunction with the Leisure Services Directorate to ensure the continuing well maintained open spaces and ensure re-establishment of any trees which have been lost or need replacing.

(2) Walking and other recreation

National Planning Policy Framework

Planning must perform: “a social role – supporting strong, vibrant and healthy communities, by....creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being....”(Para 7)

“Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, includingimproving the conditions in which people live, work, travel and take leisure” (Para 9)

Planning should: “take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.” (Twelve core planning principles, para 17)

“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.” (para 73).

“Planning policies should protect and enhance public rights of way and access” (para 75).

“Planning policies and decisions should aim to:...

.. identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”(para123)

Bristol Development Framework Core Strategy

This identifies “Providing the environment for healthier living ...”as a key social issue. (Page13)

There is a commitment to:

“5. **Better health and wellbeing** - a pattern of development and urban design that promotes good health and wellbeing and provides good places and communities to live in. Bristol will have open space and green infrastructure, high quality healthcare, leisure, sport, culture and tourism facilities which are accessible by walking, cycling and public transport. This will help enable active lifestyles, improve quality of life and reduce pollution.” (Page 24)

National and local policies on related issues (section VI)

(1) Green spaces and the natural environment

2011 Government Natural Environment White Paper: The Natural Choice: securing the value of nature.

“... people cannot flourish without the benefits and services our natural environment provides.” (Executive summary, page3)

“We will retain the protection and improvement of the natural environment as core objectives of the planning system.” (Executive summary, page3)

"We want urban green spaces to be recognised as an essential asset and factored into the development of all our communities. They will be managed to provide diverse functions for the benefit of people and wildlife.... Greener neighbourhoods and improved access to nature will improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystem services and will contribute to coherent and resilient ecological networks." (para2.80)

Clifton and Durdham Downs (Bristol) Act 1861

The Downs should be fully protected as 'a place for the public resort and recreation of the citizens and inhabitants of Bristol'.

(2) Walking and other recreation

2011 Government Natural Environment White Paper: The Natural Choice: securing the value of nature.

"There is strong evidence for the economic and social benefits of green infrastructure." (para 2.81)

"We want more people to enjoy the benefits of nature by giving them freedom to connect with it. Everyone should have fair access to a good-quality natural environment." (para3.7)

"Nature is good for human health. There is a wealth of evidence on the positive effect that spending time in the natural environment has on the health and emotional wellbeing of children. The quality of the local natural environment is one of the factors that shapes our health over a lifetime. A good-quality environment is associated with a decrease in problems such as high blood pressure and high cholesterol. It is also linked with better mental health, reduced stress and more physical activity. If every household in England were provided with good access to quality green space, an estimated £2.1 billion in healthcare costs could be saved." (para 4.5)

"We want everyone to be able to make the most of 'nature's health service'. Our White Paper, *Healthy Lives, Healthy People: Our strategy for public health in England* recognises that the quality of the environment, including the availability of green space and the influence of poor air quality and noise, affects people's health and wellbeing. It details plans for a shift of power to local communities, including new duties and powers for local authorities to improve the health of local people. From April 2013, Directors of Public Health will be employed within upper tier and unitary local authorities. They will be ideally placed to influence local services, for example joining up activity on rights of way, countryside access and green space management to improve public health by connecting people with nature." (para 4.6)

"For many people, a sense of tranquillity contributes to their enjoyment of the natural environment." (para 4.31)

"In July we will launch a new Change4Life summer campaign.... This will inspire children and their families to get more active and eat more healthily over the summer holidays. Outdoor activities will be a big part of this, with ideas and tips for games in the park and healthy picnic options." (Commitment 57, page 72)

2010 Government White Paper: Healthy Lives, Healthy People: Our strategy for public health in England

Already summarised in the preceding section on the Natural Environment White Paper, this includes:

"We will make active ageing the norm rather than the exception, for example by ..protecting green spaces and launching physical activity initiatives, including a £135 million Lottery investment in a

Mass Participation and Community Sport legacy programme. We will protect and promote community ownership of green spaces..” (page7)

“The Marmot Review argues that climate change is one of the biggest public health threats of the 21st century, with the potential to increase health inequalities. There are community responses that can help address long-term challenges like climate change while having a positive impact on health in the short-term, through:

active travel – delivering low-cost health improvements and reducing emissions;

green spaces – improving mental health and the quality of community life, offering some protection from the expected increase in heatwaves and flooding;

spatial planning – promoting local ownership and occupation of public spaces;

behaviour change – embedding new ways of sustainable living and working;” (page 39)

“The *Walking for Health* programme of volunteer-led health walks and *Let’s Get Moving* will also provide important opportunities for people to be active.” (Para 3.34, page39)

“Access to green spaces is associated with better mental and physical health across socioeconomic groups.” (Para3.36, page 40)

The West of England Joint Local Transport Plan 3 2011-2026

“Our Strategy for improving the quality of life and natural environment is:

Public Realm

- Protecting and promoting areas where pedestrians and cyclists can enjoy a safer environment to encourage walking and cycling;...

Natural environment....

- Support Strategic Green Infrastructure planning....

Historic environment and public realm

- Maintain and enhance historic town and city centres, conservation areas and villages....” (para 9.6.1)

Bristol City Council’s ‘Walking Strategy for Bristol: Our Vision for 2011-2021’ (October 2011)

This aims “to make walking in Bristol easier, safer and more pleasant for everyone”.

‘We know from talking to people that they want to see fewer cars in the city and reap the benefit of lower carbon emissions, better air quality, safer roads and less noise. A city where people drive less and walk more is a healthier and more pleasant city.’ (Foreword, page3)

‘Walking should be easy, safe and pleasant. The walking network should connect key destinations either directly or via public transport networks. Walking routes should be pleasant, and interact with an interesting environment and other people. The network should be well maintained to designated standards, to keep it free from obstacles and improve safety. People should feel able to exercise their right to walk around the city in the best possible environment.’ (Page 5)

‘Walking is not just a mode of travel, it is an enjoyable and cheap form of recreation for many. Bristol's green spaces, fine harbourside, and built heritage provide excellent walking opportunities for residents and visitors alike. These opportunities need to be protected and enhanced.’ (Page 5)

‘Principles:

The walking network should be clear and coherent.

Any transport schemes should have a positive impact on the pedestrian environment, in keeping with the Road User Hierarchy

Pedestrian route priorities will influence future plans for the central area of Bristol

Gaps in the city's rights of way and green infrastructure networks should be filled, open spaces that are of strategic recreational importance for walking fully protected and walking opportunities enhanced’. (Page15)

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Paul Chick
Bristol City Council
Planning Department
City Hall
PO Box 3176
Bristol
BS3 9FS

Our Ref: 26412/A3/GT/SE/jmm

21st February 2017

Dear Paul

**16/06311/X LAND OFF LADIES MILE APPLICATION FOR CONTROLLED OVERFLOW
PARKING: RESPONSE TO DOWNS FOR PEOPLE CONSULTATION RESPONSE**

Further to our recent correspondence in relation to parking at Ladies Mile, please accept this as our formal response to the consultation comments received from Downs for People (DfP). A detailed response from Peter Evans Partnership (PEP) addressing each of the points raised in the DfP letter are included at Appendix 1 attached to this letter.

We would again like to reiterate our previous objection in being asked to respond to a non-statutory consultee. This is particularly disappointing given that the consultation period ended in December and we are still awaiting a highways response, despite numerous requests. We would have preferred to respond to detailed BCC Highways comments, as is usual practice. DfP is an informal organisation run by a single party. It is not clear who the organisation is representative of. The Downs Committee, who have overall responsibility for The Downs, are a more formal body and should be attributed greater significance. It is also unclear if DfP are seeking a reduction in car parking in the area around BZG all together, or just the use of the Downs. On one hand they suggest the availability of parking on the Downs creates "traffic chaos", whilst in the same breath suggesting an intensification of other nearby car parks should be used to increase capacity.

During the planning application process there has been huge support from the general public, from people far and wide, who understand the significant benefits Bristol Zoo Gardens (BZG) brings to the city and the south-west region. It is undoubtedly the most popular tourist attraction in Bristol, attracting over 600,000 visitors annually. Over 450 letters of support have been received in response to our application, against a handful of objections. Also, a poll has received over 3,700 votes in support. This is in addition to support from local resident's associations, business and tourism groups, and the local MP. This should be a significant material consideration in weighing the planning balance of the case.

The consultation response from DfP is extensive, with points duplicated numerous times throughout. On first reading it would appear it seeks to portray BZG as an organisation that has done little to address its need for parking at Ladies Mile. From revisiting the letter and, having reassessed the supporting information submitted as part of the application, it is actually quite clear that this is not correct.



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In 1998 permission was approved for the use of land off Ladies Mile for parking for 81 days a year. The application before you today seeks approval for 40, 35 and 30 days a year over the next 3 years. This represents more than a 50% reduction. There is no argument that there remains challenges in trying to change visitor travel habits and that BZG are particularly hindered given the nature of its somewhat unique location, and the high proportion of families that visit. BZG are fully committed to achieving the overall goal of removing the need for land off Ladies Mile for controlled overflow parking. This ambition is reflected in the continued reduction in the amount of days per year that is being sought by the variation to condition

The representation submitted by DfP seeks to belittle the Silver Accreditation awarded to BZG at the 2013 West of England Travel Plan Awards, however, this award is an endorsement of the BZG's efforts to promote sustainable modes of transport and reduce car dependency. Whilst the results of ongoing initiatives have been mixed, that is not to say there has been any lack of trying on the part of BZG. The Silver Accreditation is a testament to this.

The use of Ladies Mile is in no way seen as being a desirable arrangement by BZG. BZG would prefer to not need to re-apply for permission every three years and is doing all that they can to bring this to an end. In order to do this, a pragmatic approach needs to be taken that gradually sees the use of Ladies Mile reduced as awareness grows and visitors continue to take-up alternative travel modes. To arbitrarily withdraw the parking would create significant congestion and parking problems in the local area.

Other Matters

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that development proposals must be determined in accordance with the development plan unless material considerations indicate otherwise.

The site is designated as an Important Open Space, a Local Historic Park and Garden, and a Site of Nature Conservation Interest (SNCI) as shown on the Bristol City Council Local Plan Policies Map. The site also falls within the Downs Conservation Area.

In respect of the above designations, one must put the use of land off Ladies Mile for parking into context. The area used for parking (Ha) represents a very small proportion of the designated Downs area, approximately 0.6% of the total usable area. With this in mind, it would appear hard to conclude that there would be material harm to the overall area as an important recreational Open Space.

Furthermore, it has been acknowledged in previous planning officer reports that the site is well contained within the south-east area of the Downs bordered by mature natural screening that helps to reduce any harm to the area as an historic landscape.

Ecology

Annual vegetation reports over the past 11 years have demonstrated the limited ecological effect that parking has had on the site. The most recent 2016 report compiled by Wessex Ecological and submitted as part of our application, concludes that this trend is continuing, and that in fact there are signs of some ecological improvement:

"There is no evidence of any decline in the nature conservation value of the car parking area since 2006. Changes in the diversity and frequency of desirable species (limestone indicators) and of undesirable species (those associated with disturbed conditions) have been noted from one year to the next without any clear trend, or any ongoing divergence from the sward in the control area, being apparent. There is now some evidence of an increase in the nature conservation value of the car parking area, which may be due

to improvements in the management of car parking."

BZG Engagement and Incentives

The Council has raised concerns that perhaps BZG are not doing all that they can to address the issue of people travelling by car. We disagree and once again draw your attention to the supporting information provided as part of our submission within the Transport Statement and Travel Plan, as well as previous reports from planning officers in relation to this site. When considering Access and Movement issues as part of the 2013 application, the previous officer noted:

"However, it needs to be acknowledged that the Zoo actively engages with the Council's Travel Plan Officer and through its travel plans is endeavouring to reduce car travel to the Zoo. As outlined above, a number of new measures are proposed by the Zoo to be incorporated in a new travel plan (not yet finalised and agreed). Other measures are proposed by the Authority's Travel Plan Officer which are to be addressed when the travel plan is due for review.

In summary, the above demonstrates that applicant is pursuing a wide range of travel plan measures which has been worked out in direct liaison with the Council. There have been some successes in terms of the high car occupancy levels and the 6% increase in the number of visitors travelling to the site by public transport. However there are a number of key areas which need to be addressed and agreed with Travel Plan officers in terms of what these measures should take to adequately address them."

It may be easy to criticise BZG, when in fact the evidence suggests that it is doing a huge amount, and whilst results have not been as good as they would have liked, they continue to exhaust all available avenues in attempting to meet the overall objective of removing the need for parking on Ladies Mile.

BZG Financial

During ongoing discussions as part of this application, the Council has raised the perceived financial strength of BZG. It appears wholly inappropriate to make judgements about an organisation's financial situation based on a snapshot review of its latest position. BZG, as a charity, must ensure it spends its income on charitable purposes, i.e. educating guests (and the more guests BZG has the more it educates), educating students at all levels (pre-primary to post-graduate), conservation breeding, conservation research and field programmes. As a charity, BZG is required to spend and invest the income generated and not build up reserves. BZG does not operate on large margins, hence the £150k surplus on £11m turnover which no-one would suggest is large, this is a tiny 1.4% profit.

BZG holds reserves for three main purposes:

- i) to maintain the animal collection in case of a closure due to issues such as an outbreak of foot and mouth;
- ii) to hold a minimum level of liquid reserves, as required by the Charity Commission, in the event of an orderly wind-up; and
- iii) to allow us to reinvest in the site to ensure that BZG maintains its high standards as a breeding centre, an education and research centre as well as a premier destination in Bristol's visitor economy. This is funded from surpluses, however sometimes reserves are built-up, over more than one year, in order to fund crucial larger capital projects.

BZG must fund the cost of capital projects not only at the Zoo but also at Wild Place Project in order to keep the offering fresh, up to date and in line with its competitors. Examples of these are the recent wallaby walkthrough exhibit at the Zoo and a new Giraffe and Zebra enclosure at Wild Place Project. BZG will not be able to continue to invest in its business, salaries (£4.3m in 2016) and local trades people unless they are able to continue to attract visitors to maintain and increase surpluses.

Exploring Alternative Options

Much has been made of the potential to intensify the use of BZG's West car park by building a multi storey car park over the existing footprint. We would yet again wish to point you in the direction of our supporting documentation and the conclusions of former officers dealing with this site. This option has been explored and found to be unviable both from a financial perspective, but more importantly, a planning perspective. I hope that you yourself would appreciate that the idea of building a 3 storey car park immediately adjacent to residential dwellings in this location would be wholly inappropriate. The use of Ladies Mile is for only a limited number of days per year. Constructing a multi storey car park for such infrequent use would go against NPPF principles as it would encourage those considering travelling by alternative modes of transport to travel by car. When considering this option as part of the 2013 application, the previous officer concluded:

"The site is located within the Clifton Conservation Area and opposite Clifton Pavilion which is a Grade II Listed Building and is surrounded by residential properties. It is regrettable that drawings are limited to plans with no elevational details provided. Nevertheless, it is considered that a three storey multi storey car park building occupying the entire site and being built up to the boundary with residential properties is likely to raise significant issues such as the impacts on the Conservation Area; setting of the adjacent Listed Building and the amenity of surrounding residential properties.

The proposal could have some impact on the use of the Ladies Mile site for overflow parking in terms reducing its level of use. However, given it would only be able to provide an additional 103 spaces it would not eliminate the need for overflow parking at the site. The costing details have not been independently checked; however, they are adequate to demonstrate that such a proposal would result in significant expense for the Zoo. In conclusion, it is considered that although potentially reducing the use of Ladies Mile, the level of reduction would not provide a viable alternative to the use of Ladies Mile for overflow parking."

The use of the BZG's Wild Place site at Cribbs Causeway for a park and ride facility has been mooted by DfP. This has been explored and found to have little traction. Whilst covering a larger area than the Zoo, there is limited parking capacity on the site, making it wholly incapable of providing such a service. Furthermore, the Wild Place car park is also full on the same peak days that BZG would require the extra capacity. The Portway P&R was discontinued on viability grounds due to low usage, so why would a P&R at Wild Place prove any more successful, particularly given the journey time on the bus would be greater than it was at the Portway P&R. If such a scheme were to be physically achievable, one must also take into account the contention around the provision of a park and ride facility in a Green Belt location.

It is also worth noting, as it appears to have been missed. Whilst the need to explore alternative options is understandable, these do not form part of our application submission, which should be judged on its own merits and in line with the development plan, along with relevant material considerations.

The representation from DfP references a lot of outdated information particularly in relation to Travel Plans and Park and Ride options from around 2008 and 2009. The need to understand the

historical context of the site, whilst informative, is not particularly helpful. The situation has moved on significantly since this period, with a number of different initiatives trialled. It should be up-to-date data that forms the point of reference in determining this application.

The representation also appears to have disregard for factual accuracy. To address each individual error is unnecessary and unhelpful. However, by way of example, I wish to draw your attention to page 6 paragraph 5.2. This promotion was part of a Groupon offer which BZG have no plans to replicate. Furthermore, 10,000 tickets does not equate to 10,000 cars. Just taking account of the 3.8 person average car occupancy would result in circa 2,600 cars. This of course does not take into account people travelling by alternative means that would reduce that number significantly. Further inaccuracy is evident at page 7 paragraph 5.3. The Zoo currently pays £40,119.60pa to the Downs Committee for the use of the North Car Park and Ladies Mile not £24,000pa as stated, and this is not the only BZG car park in use for BZG visitors throughout the year. The West Car Park is also openly available. To infer that the West Car Park is "often open only to Zoo staff and/or for corporate events" is misleading. This information is included in order to highlight the inaccuracy throughout the representation. The agreement between the two organisations is private, and should have no basis in determining this or any other planning application.

Conclusion

The representation from DfP raises very few points that aren't already addressed within our planning application and supporting information. The issues raised by DfP that we have not previously addressed, is because they are not planning considerations and should form no basis in determining this application, and are not based on fact.

The application before you now, seeks to reduce the amount of days per year that the land off Ladies Mile is used for, being a significant reduction on the previous consent in 2013. The planning context for Bristol has not changed in this intervening period, with the same Development Plan in place now as was then. In this respect, I draw your attention to the concluding paragraph of the committee report from 2013:

"It is recognised that the proposed temporary use, for up to 60 days of the year, and the potential 'harm' that is caused has to be weighed in the balance against other material considerations. The Zoo is clearly an important visitor attraction and one that likely contributes to the economy of the city and, in terms of its functioning at the present time, there would appear to be a degree of reliance on the Ladies Mile overflow car park.

Having considered all of the issues it is recommended that a further temporary consent be granted. However contrary to the wishes of the applicants, officers are recommending that this be a 3 years rather than a 5 year permission and that over this time period the use of the application site for overflow car parking is reduced from 60 to 45 days. Officers come to this recommendation with the view that the ultimate objective for all concerned should be to reduce the reliance of the Downs for Zoo parking. It is proposed that after the 3 year period that the situation be reviewed. This review is particularly important in order to assess the impact, if any of the forthcoming Residents Parking Scheme as well as the any ecological impacts / general wear and tear of the site; a review of the modal shift and also the impact upon the viability of the Zoo itself. At the current time it is your Officers view that in moving this issue forward beyond the three year period, the overriding objective should be to cease the use of the site for overflow car parking.

RECOMMENDED GRANT subject to Planning Agreement"

The officer's conclusion aligns with the aspirations of the BZG, to reduce the reliance of the Downs for BZG parking with the ultimate aim for this to cease entirely. The current proposal, whilst attracting objection from a handful, is hugely supported by the majority. This is evident from the response to the application. BZG has made huge strides in reducing its reliance of Ladies Mile, from 81 days in 1998 to 41 days in 2016, with this reduced to 30 days in 2019. BZG has always seen the use of Ladies mile as an absolute last resort, having consistently underutilised its use in previous years when compared to the allowances consented in previous approvals.

In weighing the planning balance of this case, one must give great weight to the incredible contribution that BZG makes to the city. This should not just be limited to a financial aspect, but also the non-tangible benefits it brings to culture, education and diversity. In order to achieve the overall aim of ceasing the use of Ladies Mile, BZG are taking a pragmatic approach that requires the ongoing support of the council. One cannot expect the changing of travel behaviour overnight, from dependency on the private car, which is a national, potentially international issue. To end the use of Ladies Mile for overflow parking prematurely would be short-sighted considering its use is reducing. The result of which would see visitors given more incentive to visit alternative attractions locally where there is free parking available on-site. This will be seen as the 'easier option' for visitors and lead to greater private car usage in and around Bristol, negating the positive progress made at the Zoo.

Any limited potential harm caused as a result of parking on land off Ladies Mile is far outweighed by the numerous benefits that BZG brings, is reflected in the over 450 letters of support received. This was the decision in 2013 and considering the planning context is unchanged, this application should also be supported.

Yours sincerely



GEORGINA TIBBS

Associate

Encl.

Paul Chick
Bristol City Council
Planning Department
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PO Box 3176
Bristol
BS3 9FS

Our Ref: 26412/A3/GT/SE/jmm

22nd February 2017

Dear Paul

**16/06311/X LAND OFF LADIES MILE APPLICATION FOR CONTROLLED OVERFLOW
PARKING: RESPONSE TO DOWNS FOR PEOPLE CONSULTATION RESPONSE OBJECTION 3:
FINANCIAL AND ECONOMIC**

Further to our recent correspondence in relation to parking at Ladies Mile, please accept this as our formal response to the consultation comments received from Downs for People (DfP) - Objection 3: Financial and Economic. This follows our response dated 21st February 2017 to objection 2 relating to transport and travel.

For ease, I include the comments made by DfP (reproduced in *italics*) followed by our response.

III The zoo's finances

- 3.1 *Bristol Zoological Society operates the zoo. In its statement accompanying the planning application, the Society stressed that the zoo was completely self-financing: profits were always invested back into saving wildlife and enhancing the experience for the visitor.*
- 3.2 *We have looked at the Society's accounts for 2015. These show that the Society had a total income of £9.6 million in 2015, of which £6.3 million was attributed to the zoo (excluding commercial trading). The Society's total expenditure was £9.5 million, £6.6 million on the zoo. £551k was spent on conservation and research projects, of which £393k came from restricted funds such as grants.*
- 3.3 *The accounts do not show exactly how much the zoo makes from parking. There is a figure of £643k for 'other income' which covers 'car parks, education fees, vet consultancy etc.'. In our analysis of travel and transport issues we estimated that the zoo was making a profit of about £100k a year on the North car park and over £20k on the one on the Downs. (The Downs Committee appears to charge very little for the licences to use these sites).*
- 3.4 *The accounts show an organisation with a strong balance sheet:*
- *total income up 6.7% in the year;*
 - *large asset value of land and buildings;*
 - *little debt;*
 - *investment property and listed investments worth over £5m;*



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- *a defined benefit staff pension fund in surplus (very rare; most defined benefit pension funds are in deficit).*

Bristol Zoo response

Bristol Zoological Society (BZS), as a charity, must ensure it spends its income on charitable purposes, i.e. educating guests (and the more guests it has the more it educates), educating students at all levels (pre-primary to post-graduate), conservation breeding, conservation research and field programmes. Consequently BZS spends the income generated on charitable purposes through the year and does not build up large reserves. BZS does not operate on large margins, hence the £150k surplus in 2016 on £11m turnover, is the equivalent of 1.4% profit, which no-one would suggest is large.

BZS holds reserves for three main purposes;

- to maintain the animal collection in case of a closure due to issues such as an outbreak of foot and mouth,
- to hold a minimum level of liquid reserves, as required by the Charity Commission, in the event of an orderly wind-up, and
- to allow us to reinvest in the site to ensure that the Zoo maintains its high standards as a breeding centre, an education and research centre as well as a premier destination in Bristol's visitor economy. This is funded from surpluses, however sometimes reserves are built-up, over more than one year, in order to fund crucial larger capital projects.

BZS must fund the cost of capital projects not only at the Zoo but also at Wild Place Project in order to keep the offering fresh, up to date and in line with its competitors. Examples of these are the Wallaby Walkabout at the Zoo and a new Giraffe and Zebra enclosure at Wild Place Project. BZS will not be able to continue to invest in its business, salaries (£4.3m in 2016) and local trades people unless they are able to continue to attract visitors to maintain and increase surpluses.

The fixed assets of land and buildings are not relevant to the day to day financial viability of the BZG and the Bristol Zoological Society. £6.8m of our land and buildings is charged/mortgaged to cover the loans and the future liabilities on the defined benefit pension scheme.

At 31st December 2016 the pension scheme is once again in deficit due to revised actuarial valuations, with future liabilities protected by a charge on specific land and buildings in Clifton to a value of £1.3m and a continued payment plan into the pension scheme which is funded by Bristol Zoological Society by the Zoo surpluses.

The car park is there to allow a variety of guests from across the country to access our educational great day out, and although does provide revenue, this is to cover the robust management and maintenance of the space, as custodians of the land, including; stewarding, litter picking, maintenance and repairs, ecological surveys etc.

IV. The impact on the zoo of the loss of the Downs car park

- The Zoological Society's statement accompanying the planning application says that loss of the Downs car park would result in a "huge financial loss to the Zoo - £500k in income each year". There is no explanation of this figure. We understand it is based on the total number of visitors using the car park multiplied by the cost of admission. For 2015 this would have been:*

38 (number of days) x 343 (average number of cars) x 3.8 (average car occupancy) = 49,530 visitors.

*The 2015 accounts say average admission per head was £10.36. **On this basis, the loss would be £513k.***

4.2 *But this figure takes no account of three factors:*

- **many users of the Downs car park do not pay for admission.** *The zoo's latest accounts show only 72% of visitors paid. (The zoo has over 20,000 members who pay an annual subscription, not for each admission).*
- **most of the users of the Downs car park would visit the zoo if the car park were not available.** *A survey for the zoo by Pinnacle consultants in 2009 found that 83% would still come.*
- **the zoo can provide attractive alternatives.** *We described the main ones in our analysis of the transport and travel issues. Last year's survey of zoo visitors found that 54% of those coming by car would consider Park & Ride, 27% train travel, 24% bus and 9% bike with the existing discounted offers, even when the car park was available. The Pinnacle study in 2009 showed a Park and Ride service from the Portway could take 63% of zoo visitors at peak times. For those who must come by car, the zoo could develop its West car park.*

4.3 *Applying the 72% and 83% figures to the zoo's estimated loss of £513k reduces it to a £63k loss. This is for admission fees only. Including the average spend per visitor (paying and non-paying) of £2.50 on catering and £2.23 on retail, increases the potential losses of income to £102k. These losses would not occur if the zoo provided attractive alternatives. If they did occur, it would be the equivalent of a loss of about 1% of the Zoological Society's income, which could be recouped by charging each paying guest about 25p more.*

Our view of the impact on the zoo: *much less than the £500k claimed. Could be about £100k if the*

Zoo took no action to provide alternatives. There is no threat to the zoo's viability –the money could be recouped through a modest increase in admission fees and is about 1% of the zoo's income.

Bristol Zoo Response

There is no exact calculation here, as on one day the car park could be filled with day guest from all over the city and further afield, and on another day it could be filled with members. However DfP have calculated a figure (£513k), slightly greater than ours, for the value of the cars using Ladies Mile.

It is not valid to make assumptions based on overall annual visitation to the zoo and apply them to the short periods of high visitation when Ladies Mile is in use. On high visitation days, the proportion of paying visitors is inevitably much higher and applying percentages from the whole year does not reflect the real situation. The survey from 2009 is now eight years out of date; and drawing conclusions about today's visitors when much has changed economically over that period is somewhat spurious.

Our admission prices are set at a level which delivers value for money for our guests and are the result of understanding our market. Arbitrary increases to the entrance fees to the zoo would put the Charity's financial viability, and its ability to deliver its charitable aims, at risk. The value of the cars on Ladies Mile far exceeds the annual 'profit' made by the society. It is naïve to suggest that adding a random amount to the admission price would solve all the problems and this exercise should be left to the professional visitor attraction experts to manage. The zoo is aimed at a very specific and affordable market and we want to ensure that the zoo remains an inclusive experience accessible to everyone in the local area and beyond.

V The impact on the city of the loss of the Downs car park

(1) The zoo's claim: a £2million loss

- 5.1 The zoo has lobbied its members and other potential supporters of Downs parking as follows:

*"Bristol Zoo is the most popular visitor attraction in the city but if people cannot park they will be discouraged from visiting not just the Zoo but the city. **Our economic contribution to the city of Bristol would decrease by over £2million without this parking option.**"*

- 5.2 Dr Bryan Carroll, CEO of the zoo, explained how they had calculated the £2 million decrease:

"The average spend per visitor is £42.39, which when multiplied by the visitors who used Ladies Mile in 2015 (343 cars x 3.8 pax per car x 38 days = 49,529) = £2,099,542"

(2) Errors in the £2million calculation

- 5.3 The zoo's calculation contains four major errors as set out below. **The city does not gain £2million from the use of the Ladies Mile car park: the impact on the rest of the city from its loss would be negligible.**

Error1: mis-use of Great Britain Day Visits Survey data

- 5.4 The zoo has taken the figure of £42.39 for the average cost of a visit to Bristol from the Great Britain Day Visits Survey

But the £42.39 spend is not per visitor but per trip ie per car in this case. The figure should not have been multiplied by average car occupancy. The zoo's result is about four times higher than it should have been.

- 5.5 There are other problems in using data from the Day Visits Survey. The survey covers a huge range of activities from visiting friends and family (almost cost-free) to special shopping trips (very expensive). Data for Bristol came from interviews with about 400 visitors over a three -year period. This data may be aggregated to give an average figure for spend in the city but cannot be disaggregated to give a reliable figure for one attraction.

Errors 2 and 3: assumptions that everyone pays and everyone stops visiting

- 5.6 The zoo has assumed that all users of the car park are paying visitors and that none of them will visit if they cannot park there. As explained in para 4.2 above, only 72% of zoo visitors pay for admission and 83% of users of the Downs car park say they will still come if it is not available.

Downs for People calculation of income loss

- 5.7 We have taken key statistics from the zoo's 2015 annual accounts to calculate revenue from the Ladies Mile car park:

- Total guest numbers - 545,722
- Paid attendance* - 394,336
- Percentage of paying guests* - 72%

- Admission income per head - £10.36
- Day visitor catering spend per head - £2.50
- Retail spend per head - £2.23
- Total spend per paying guest - £15.09
- Total spend per car for paying guests (assuming 3.8 passengers a car) - £57.34
- Total spend per non-paying guest - £4.73
- Total spend per car for non-paying guests (assuming 3.8 passengers a car) - £17.97

**The zoo has over 20,000 members who pay an annual subscription, not for individual visits.*

5.8 Using these figures gives a total spend at the zoo by users of the Downs car park in 2015 of £603,692 (£538,122 from paying guests and £65,596 from non-paying guests).

5.9 As already explained in para 4.2 above, surveys undertaken by Pinnacle Transportation for the zoo in August 2009 showed that 83% of the users of the Downs car park would still come to the zoo if the car park were not available. This means the zoo's potential loss of income is 17% of £603,692 = £102,627.

Error 4: assumption that all zoo visitors spend money elsewhere in Bristol

5.10 The zoo claims that the city as a whole benefits from its visitors because it wrongly assumes that every visitor to the city spends an average of £42.39 (para 5.4 above). Hence a carload of zoo visitors would spend £161, only £57 of it at the zoo (our figure in para 5.7 above). But the £42.39 figure is per visit, not per visitor (para 5.4). A trip to the zoo costs £15 more than the average trip to Bristol without any expenditure elsewhere.

5.11 In practice, zoo visitors in general and those using the Downs car park in particular do not spend any money elsewhere in Bristol as part of their visit. The zoo's 2016 travel survey showed 64% of visitors were on day visits and 24% lived locally. Only 6% were staying in the area, probably many with family and friends. 26% of visitors came from South Wales. (Para 5.1.9 of the travel plan submitted with the zoo's planning application).

5.12 Because it opens after the other two car parks are full, the Downs car park has a particularly high proportion of users on long day trips. The Pinnacle surveys around the August bank holiday weekend 2009 showed more users of the Downs car park came from outside Bristol than the average (73%) for all visitors to the zoo. 91% travelled from outside Bristol on Thursday, 86% on Saturday, and 88% on Monday. The peak time for arrivals was 11am to 12.30pm. The average length of stay was about 4 hours [the zoo says it is now 5 hours].

Our view on the impact of the loss of Downs parking on the city: negligible. Most users of the Downs car park are on day trips from places such as South Wales. They arrive late morning, visit the zoo for about five hours, and return home without spending more money in Bristol.

Bristol Zoo Response

This view is based on a series of assumptions that cannot be substantiated. For instance, it is purely an assumption that a guest to the zoo will come on a day visit only. Destination Bristol, and other experts in visitor attraction behaviour, have provided much evidence demonstrating that many people travelling to zoos will combine it with overnight stays.

There are many ways of assessing the economic impact of a business or class of businesses. One

example is an assessment carried out by the British and Irish Association of Zoos and Aquariums, in which the Zoo took part.

This is the Socio-Economic Impact of members of the British & Irish association of zoos and aquariums (BIAZA) (2013 report)

From this BIAZA report, it shows that the visitors who arrive to BZG through Ladies Mile are worth £2m to the local economy:

'In 2011 the Tourism Boards in England, Scotland and Wales carried out a survey of 38,083 people which identified 14 million visits to 'zoos and safari parks' with an average spend of £53.50 per head, which is far higher than the average spend of £34.00.'

302 cars per day for 41 days of the year @ 3.4 pax per car, spending an average of £53.50 per head = £2,252,285.80. Even if the lower figure is used it amounts to some £1, 700,000, with the mid-range being around £2,000,000.

The assumption that zoo members should be discounted from the analysis of contribution to the economic benefit is clearly flawed.

Destination Bristol have provide the below statement of support in regards to this position and the critical role the zoo plays in the Bristol economy:

'Bristol Zoo Gardens has been one of Bristol's top tourist attractions for more than 180 years and is of both cultural and historical importance as well as being a significant visitor attraction for both families, groups, friends and couples.

It has consistently been the most visited paid for attraction in the city attracting on average more than 500,000 visitors per year, and at times visitor numbers have exceeded that of the free attractions in the city. This alone makes Bristol Zoo Gardens one of the most critical elements of Bristol's Visitor Economy which has grown substantially in the last 10 years, now worth in the region of £1.3bn.

Whilst impossible to calculate the exact value of the zoo to the local economy, using visitor numbers, their drive times and average spend – based on the figures given by an independent research company in our annual Economic Impact of Tourism Study – we estimate that the value of visitors alone would be in the region of £2m per annum.

This includes day visitors, those staying in the city who travel domestically and international visitors.

This does not include any added value such as the media coverage earned for the city through their own activity, the value of conferences and events that take place there or the spend by their employees in the local economy.

The zoo has continued to evolve and innovate over its long history, winning awards for its development most recently a Gold South West Tourism Award for The Lodge.

The success of Bristol Zoo Gardens is a critical part of the success of Bristol as one of the UK's leading visitor destinations and it would be a devastating blow to the city and region to lose an internationally significant icon, both economically and reputationally.'

Destination Bristol February 2017.

VI The zoo's economic importance to Bristol

(1) The zoo's claims

6.1 *The zoo has made four claims about its economic importance to Bristol:*

- 1) *it is the most popular visitor attraction*
- 2) *zoo visitors benefit the local economy by more than £51,000 a day and over £18.6 million a year*
- 3) *the zoo's contribution to the city is greater than this because these figures do not take account of "factors such that we employ 200 local people and procure local businesses, supplying numerous services".*
- 4) *the zoo is hugely important to the city's tourism economy.*

6.2 ***None of these claims is true, as explained below.***

(2) Popularity of Bristol's visitor attractions

6.3 *By many measures, Bristol Zoo is not the city's most popular visitor attraction. It is no. 13 on Tripadvisor. The SS Great Britain and the Suspension Bridge are the top scorers, with the City Docks and most of the city's major landmarks and museums ahead of the zoo. It is not highlighted on the Visit Bristol website. That site's home page suggests Bristol is all about the Bs – Brunel, boats, bridges, bikes and beautiful countryside. The page has a photo of Noah's Ark Farm Zoo, not Bristol Zoo.*

6.4 *In terms of visitor numbers, the Suspension Bridge and Harbourside will attract many more visitors than the zoo but the numbers are not recorded. Where visitors are counted, the top ten attractions in the West of England are listed in the table below, with those in Bristol highlighted.*

Table: Major Attractions in the West of England

Table: Major Attractions in the West of England			
Attraction	Local Authority	Free/Paid admission	Annual Visits (2011)
Grand Pier, Weston Super Mare	North Somerset	F	3,000,000
Roman Baths	Bath & NE Somerset	P	975,096
M Shed	Bristol	F	640,000***
Arnolfini	Bristol	F	460,000***
Bristol City Museum & Art Gallery	Bristol	F	430,000***
Watershed	Bristol	F	420,000***
Bristol Zoo Gardens	Bristol	P	560,000***
Bath Abbey	Bath & NE Somerset	F	394,387
@Bristol	Bristol	P	170,000***
Brunel's SS Great Britain	Bristol	P	160,000***
Bristol Aquarium	Bristol	P	140,000***
Dyrham Park	South Gloucestershire	P	135,920**
Noah's Ark Zoo Farm	North Somerset	P	138,116
Tyntesfield	North Somerset	P	218,551
Fashion Museum	Bath & NE Somerset	P	129,184
Victoria Art Gallery	Bath & NE Somerset	F	110,498
The Holburne Museum of Art	Bath & NE Somerset	F	110,105

Sources: Annual Survey of Visits to Visitor Attractions, 2010, Visit England ; Bath Tourism; Destination Bristol;

*2009 figure

** 2010 figure

***(rounded)

According to the above data, M Shed is the most popular visitor attraction, and it is notable that the other Bristol attractions in this table are situated in fairly close proximity within the city centre.

More recent (although partial) information for 2015 is available from Visit England. This shows the M Shed to be still in the lead with visitor numbers of 550,00 but the zoo is only slightly behind at 546,000. Both have reduced visitor numbers compared to 2011.

Our view of the zoo's ranking: the zoo is not the most popular visitor attraction in Bristol. Its less frequent claim to be the single "biggest paid-for destination in Bristol" is correct. Many more people visit the Harbourside attractions collectively.

Bristol Zoo Response

It is ludicrous to say the zoo is not important to Bristol's tourism economy. See Destination Bristol's statement above.

We are the most popular and most visited paid-for attraction in the city. One cannot group other attractions together and then compare to a single attraction. The figures stated by DfP above are we assume from 2011/2012 (when M SHED first opened). The 2015 figures show us to be pretty much equal. Unlike M SHED, however, we pay our own way and consequently our income is put back into the city through wages, supply chain effects, education and conservation programmes.

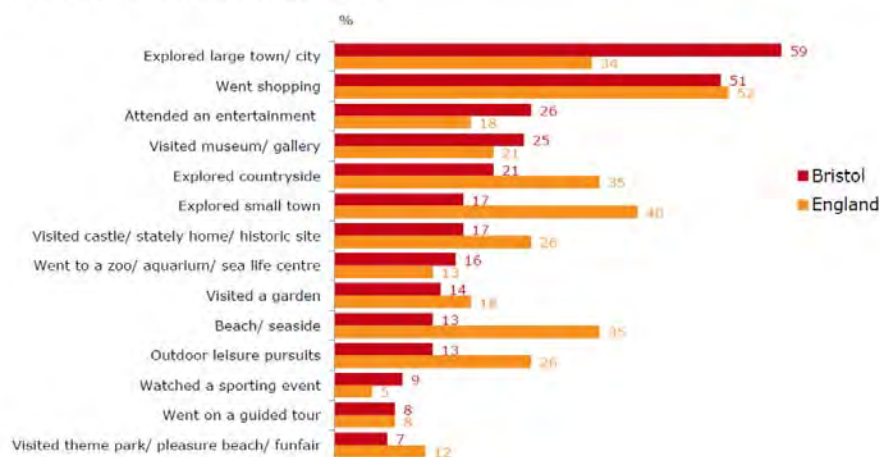
This also reinforces that we are a huge contributor to the local economy as people pay to visit.

The zoo does benefit the local economy and does employ hundreds of local people and procures local businesses and services.

A survey conducted by Visit England, Visit Bristol, around 'Visitor satisfaction and growth potential' (2013), as demonstrated in the graph below, shows visitors to Bristol are more likely to visit a zoo than the national average.

Who are the current visitors to Bristol?

Within Bristol, exploring the city is the number 1 activity; whilst there shopping and going to entertainment are the most popular pastimes. Visiting locations outside of the main city, going to the countryside/ small towns are also enjoyed



Visit Bristol, Visit England (2013) Survey

(3) Errors in the daily and annual contribution calculations

- 6.5 *The zoo has not explained the basis of its daily (£51k) and annual (£18.6million) figures for zoo visitors' benefits to the local economy. The two figures clearly have the same source: £18.6 million is a straightforward multiple of £51,000 (the zoo is open 364 days a year). Given the order of magnitude, these estimates are almost certainly derived - like the zoo's erroneous £2million calculation - from the Great Britain Day Visits figure of £42.39. £18.6 million from the 394,336 paying guests to the zoo in 2015 would mean each contributed £47.09 to the city.*
- 6.6 ***These figures are no more credible than the £2million.** As already explained in the analysis of that figure (paras 5.4 to 5.12), people on an average day trip to Bristol do not each spend over £40. They spend £42.39 **together** on a trip. Most of those visiting the zoo do not spend money anywhere else in Bristol as part of their trip (paras 5.13 and 5.14).*

Our view of the zoo's total contribution to the city: the Zoological Society had an income of £6.3 million from the zoo in 2015 and spent £6.6 million on it. There is no additional or surplus income of the order of £18.6 million a year from zoo visitors to go elsewhere in the city. The total contribution is the portion of the £6.6million spent in Bristol.

Bristol Zoo Response

This has been commented on above, including comment from tourist professionals and experts, Destination Bristol.

The zoo provides a reason for visitors to visit the city and stay for longer periods, and increase their dwell time, enjoying the wider city amenities including shops, restaurants, hotels and evening entertainment etc.

Zoos provide a unique opportunity for visitors, which is hard to quantify. However, taken from the BIAZA 2010 message 'The Economic Impact of the UK's zoo and aquarium sector':

- "Zoos, aquaria and similar sites in the UK generate total economic activity in the region of £645 million annually, on a conservative estimate
- As significant tourist attractions, the spending by visitors in zoos of some £246 million is enhanced by associated off site spending in the region of £198 million"

This latter point indicates that whatever a visitor spends in a zoo, there is an additional spend of 80% off site.

BZG has yet to include other elements of value, such as the huge national, and international, news such as 2016's birth of the baby Western lowland gorilla, Afia. Without the zoo, this recognition and promotion of Bristol would not have happened.

(4) Additional benefits from employing staff and procuring goods and services from local businesses

- 6.7 *Almost all the zoo's money comes from its visitors: it does not have a large separate income stream to pay for staff and supplies etc. The zoo and its staff may spend money in the city, but it is still the same money from visitors - it cannot be counted two or three times. That is, it is not **additional** to the £6.6 million expenditure on the zoo but part of it. The scale of the possible loss of income to the Zoo (para 5.9) is only in the region of £100,000, which would have negligible impact on the contribution of the zoo to the Bristol economy. It is not sufficient to significantly affect zoo employment or local spending levels.*

Our view of the benefits to the city from the zoo's employment of staff and local business procurement: *this is expenditure from the zoo's £6.3 million income from zoo visitors, not additional to it. The potential loss of income from the Downs car park would not significantly affect the zoo's employment or spending levels.*

Bristol Zoo response

See comments above on economic impact assessment regarding benefits to the city. The potential loss of income is over £500,000. No business and in particular a charity, could afford a drop of that magnitude without it affecting financial viability, employment and supply chains.

(5) The zoo in context: the city's economy and plans

- 6.8 *The zoo claims to be 'a huge part of the city's tourist economy'. But tourism overall does not play a huge part in the city's economy and the zoo is a minor player.*
- 6.9 *The Bristol Zoological Society employed the equivalent of 163 full-time staff in 2015, 78 at the zoo. (The total average monthly headcount was 199.) With fewer than 250 staff and an annual turnover well below 50 million euros, it falls within the usual definition of an SME (Small and Medium-Sized Enterprise). It makes a very small contribution to Bristol's overall economy: 5000 people work at the Cabot Circus shopping centre alone. The Zoological Society's employees (199) are equivalent to just 0.18% of Bristol's city centre jobs (109,500).*
- 6.10 *The Bristol Development Framework Core Strategy (2011) is a key part of the local development plan. It notes that the city has a varied economic base but makes no mention of tourism among its examples (page 11). The overarching issue is "Ensuring a sustainable future for Bristol". (Page 13). Commitments include: "Enabling development in leisure, sport, culture and tourism within existing communities and in new development to give greater opportunity for locally-based activities thereby reducing the need to travel." (Page 14). This is reflected in policy BCS 7 (page 63): "Retail development, offices, leisure and entertainment uses, arts, culture and tourism uses will be primarily located within or, where appropriate, adjoining the centres in the identified network and hierarchy serving Bristol."*
- 6.11 *The strategy's more specific ambitions for tourism are largely confined to the city centre. It says (page 19): "The city centre will have an enhanced cultural and tourism offer for residents and visitors with new regionally important facilities complementing the city's established venues and facilities". This is reflected in policy BCS2 (page 36): "Bristol City Centre's role as a regional centre will be promoted and strengthened. Development will include mixed uses for offices, residential, retail, leisure, tourism, entertainment and arts and cultural facilities." This policy has been developed further in the Bristol Central Area Plan (2015) which seeks (Policy BCAP9) more cultural facilities, tourist attractions and water-based recreation in the central area. It makes specific mention of the new arena.*
- 6.12 *There are no specific references to Bristol Zoo in the development plan, nor to encouraging more tourists to North West Bristol generally. The emphasis is on major tourist development in the city centre and local amenities elsewhere.*

Our view of the zoo in the context of the city's economy and plans: *the zoo is a small player economically. Planning policies for tourism in the city focus on locally-based activities which reduce the need to travel and on regionally-important facilities in the city centre. Bristol Zoo, which has been encouraging people to drive from ever-greater distances, does not conform with either policy.*

Bristol Zoo Response

We are a huge part of Bristol's tourism economy and a nationally important facility just outside the

city centre. It is not clear why this is even being questioned. See extracts below of Destination Bristol's comment above:

'Bristol Zoo Gardens has been one of Bristol's top tourist attractions for more than 180 years and is of both cultural and historical importance as well as being a significant visitor attraction for families, groups, friends and couples.

It has consistently been the most visited paid for attraction in the city attracting on average more than 500,000 visitors per year, and at times visitor numbers have exceeded that of the free attractions in the city. This alone makes Bristol Zoo Gardens one of the most critical elements of Bristol's Visitor Economy which has grown substantially in the last 10 years, now worth in the region of £1.3bn.

The success of Bristol Zoo Gardens is a critical part of the success of Bristol as one of the UK's leading visitor destinations and it would be a devastating blow to the city and region to lose an internationally significant icon, both economically and reputationally.'

The zoo does not encourage people to drive, however it must be accepted that the car is still a vital mode of transport for so many people across the region and further afield. How does a mother with three children, a buggy and picnic, whether from a hamlet in Devon or from Dundry (or indeed anywhere else), effectively and safely visit the zoo?

We have a plethora of sustainable transport initiatives on offer and continually review these. We also have one of the, if not the, best car occupancy rates around (3.4 persons per car) which means that our visitors, who come by car, travel by sustainable means.

VII The impact on the world of the loss of the Downs car park

7.1 *The Zoological Society's letter in support of its planning application stresses that it is not just a visitor attraction but aims to save wildlife. Its 'conservation science efforts are carried out worldwide' and it gives examples. Its appeal to the public to support its planning application ends: "Bristol Zoological Society is a conservation and education charity and relies on the generous support of the public not only to fund its important work in the Zoo and at the Wild Place Project but also its vital conservation and research projects spanning five continents". It says it has established over 30 field conservation and research programmes all over the world in the course of its 180-year history.*

7.2 ***The zoo's charitable status and conservation work abroad are not material planning considerations.*** *In any event, the zoo is again exaggerating its own importance. Its accounts show that in 2015 it spent only £551,000 on conservation and research projects. This modest sum contrasts with much greater expenditure by conservation organisations such as WWF-UK, which spent £34.6 million on conservation projects and £9.4 million on 'community influencing and awareness'. Only £158k of the zoo's spending came from its 'unrestricted' funds such as admission charges. The rest was from 'restricted' funds, such as grants, donations and legacies. **There is no reason why loss of the Downs car park should interfere significantly with this work.***

Our view of the impact on the zoo's conservation work: *given its high reliance on restricted funds, this seems an unlikely candidate for any cuts, should the zoo choose to make some. This is not anyway a material planning consideration.*

Bristol Zoo Response

The figures quoted above account only for the external spend on field conservation and science. It does not include core institutional funding on salaries nor money spent in conservation breeding programmes, awareness raising or community influencing. Taking account of all aspects of zoo

conservation, our annual charitable spend in our 2015 accounts was in excess of £9 million, the bulk of which was on conservation activity.

VIII Conclusions

8.1 *This analysis shows that the zoo has greatly exaggerated the impact of the loss of the Downs car park on its own finances and on the city's economy. It has also exaggerated its importance to the city. The table below sets out the zoo's claims and our findings.*

<u>Item</u>	<u>Zoo's claim</u>	<u>Our finding</u>	<u>Reason for difference</u>
<i>Loss to zoo from planning refusal.</i>	<i>£500k (admission charges only)</i>	<i>£102k or less (all spending at the zoo).</i>	<i>Not all users pay and most will continue to come.</i>
<i>Loss to city</i>	<i>£2 million</i>	<i>Negligible</i>	<i>Zoo figure based on misapplied statistic. Car park users don't spend anything elsewhere</i>
<i>Daily zoo contribution to city</i>	<i>£51k</i>	<i>Zoo gets an average of £18k a day in visitor spending. Negligible visitor expenditure elsewhere.</i>	<i>As above (we assume).</i>
<i>Annual zoo contribution to city</i>	<i>£18.6 million</i>	<i>Up to the total expenditure on the zoo of £6.6 million. Negligible visitor expenditure elsewhere.</i>	<i>As above (we assume).</i>
<i>Spending on staff and services</i>	<i>Unspecified additional contribution to city.</i>	<i>Zero.</i>	<i>Double-counting, Staff are funded from the zoo's general income, mainly from visitors, and expenditure on them is included in the £6.6million.</i>
<i>Spending on conservation work</i>	<i>Implicitly threatened.</i>	<i>Highly unlikely to be affected.</i>	<i>Relatively little expenditure and mainly from 'restricted' funds not general income.</i>

8.2 *We find that the zoo's finances are generally healthy and that the loss of the car park would pose no threat to its viability. It could avoid financial losses altogether by providing visitors with attractive alternatives or by putting up its charges slightly.*

8.3 *The zoo is a much-loved visitor attraction and local amenity. But it is not of great economic importance to the city, nor is there anything in the city's development plan to suggest that it should be particularly encouraged or protected. **The financial and economic issues raised by the zoo in its application and public lobbying should not be considered material considerations when determining the application.***

Bristol Zoo conclusion

In conclusion the responses to DfP demonstrate the following:

- BZS is a thriving and important charity. As a charity it is spending its income on charitable purposes and makes a tiny £150,000 (1.4%) 'profit', which goes back into the conservation objectives and improving the site for visitors to enjoy.
- The value of the cars which utilise Ladies Mile (£513,000) far outweighs the total profit for the

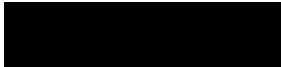
charity.

- The Tourism Boards in England, Scotland and Wales' survey of visits to 'zoos and safari parks' demonstrated an average spend of £53.50 per head, making the value of the accessibility to Bristol Zoo Gardens through Ladies Mile worth £2,252,285.80.

Using this calculation, our overall visitor numbers (560,000) multiplied by the average spend figure (£53.50) demonstrates an overall value to the city and surround economy of £29,960,000.

- Therefore, it is no surprise that Destination Bristol, expert visitor attraction professionals, state that BZG are 'one of the most critical elements of Bristol's Visitor Economy' and that 'the success of BZG is a critical part of the success of Bristol'.
- The zoo provides a reason for visitors to visit the city and stay for longer periods, and increase their dwell time, enjoying the wider city amenities including shops, restaurants, hotels and evening entertainment etc.
- The zoo does not encourage people to drive and has a plethora of sustainable transport initiatives on offer. The zoo also has one of, if not THE, best car occupancy rates in the city (3.4 persons per car) therefore our visitors, who come by car, travel by sustainably.
- The zoo provides a unique opportunity for visitors near and far, and the financial benefit to the city, and wider surrounding area, is so varied it is actually unquantifiable – as demonstrated with the Afia story that generated national, and international, recognition for the city.

Yours sincerely



GEORGINA TIBBS

Associate

Encl.

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Our Ref: 26412/A3/GT/SE/jmm

7th March 2017

Dear Paul

**16/06311/X LAND OFF LADIES MILE APPLICATION FOR CONTROLLED OVERFLOW
PARKING: RESPONSE TO DOWNS FOR PEOPLE CONSULTATION RESPONSE OBJECTION 4:
THE IMPACT ON THE DOWNS**

Further to our recent correspondence in relation to parking at Ladies Mile, please accept this as our formal response to the consultation comments received from Downs for People (DfP) - Objection 4: The Impact on the Downs. This follows our responses to objection 2 relating to transport and travel, and objection 3 relating to finance and economic issues.

As you are no doubt aware, we would once again like to draw your attention to the letters of support for this application, which now exceed 600 on the Bristol City Council website. However, hopefully this letter responding to a minority group will assist with establishing the DfP comments should be given limited consideration.

For ease, I include the comments made by DfP (reproduced in Italics) followed by our response.

III. The importance of the site

(1) The zoo's claims

3.1. Since its first planning application in 1998, the zoo has emphasised that the Downs car park is small and unimportant relative to the overall size of the Downs. Until the current application, the zoo has always said the site comprises 1.34 hectares, 0.7% of the total area of the Downs. The current application is for the same site but the Bristol Zoological Society, in their accompanying statement, has reduced the area to 1 hectare, a 25% reduction of almost an acre. It says a hectare - and hence the site - is less than half a per cent of the total area of the Downs. This claim has been repeated on the zoo's web-site and in numerous messages to its members and supporters.

Our comment: the zoo appears to have 'rounded down' the size of the site significantly for lobbying purposes. In any event, it is the quality of the site and the quality of the Downs as a whole that make it important (see below).

The site area is 1.34 hectares. BZG has at no point inferred that the area of the downs that is used for parking is "small and unimportant". BZG has put the size of the site into context within the overall size of the downs. It is for the Council to make their own judgement as to the importance of the site, taking into account the facts. If DfP truly believe that the difference between 0.5% and



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0.7% has a material difference, then that is their opinion. However, this is not important to the determination of the application.

(4) Vegetation

3.6 The car park is part of a Site of Nature Conservation Interest, the Clifton and Durdham Downs, of botanical interest for its grassland. The ecologist employed by the zoo to undertake annual vegetation surveys pointed out: "Unimproved grassland is the habitat of greatest nature conservation value on the Downs and is a Biodiversity Action Plan (BAP) priority habitat". As noted above, the grassland is particularly fine in this part of the Downs. Much is being done to increase the Downs' wildlife interest generally, with, for example, a wildflower meadow just across Ladies Mile from the zoo's car park and with goats in the Gully.

Our conclusion: this is a particularly attractive area of grassland, of great value for recreation and of conservation interest.

It should be noted that when DfP refer to a previous point made "as noted above" they are in fact referring to their own previous comment and not that of either a previous planning officer or BZG's ecologist- a specialist in the field. The Vegetation Report of 2016 and submitted as part of the application concludes:

- The composition of the vegetation in both areas has been broadly stable since 2006.
- The car parking area, when compared to the control area, has a similar diversity of plants of unimproved grassland but a slightly elevated diversity of plants indicative of disturbance.
- There is no evidence of any ongoing decline in the diversity of plants of unimproved grassland in the car parking area, and in recent years some evidence in an increase.
- There is no evidence of any ongoing increase in the diversity of plants indicative of disturbed conditions in the car parking area. Fluctuations are evident in the species recorded from year to year, but the overall diversity and frequency of weedy species changes little.

This highlights that there has been limited ecological harm to this area of the Downs and in fact, there are signs of some improvement, no doubt as a result of the parking protocol adopted by BZG. DfP has failed to recognise that visiting BZG does in itself provide great value for recreation and conservation.

The Council's Nature Conservation Officer Dr Nick Michael in his consultation response of 15th December 2016 has welcomed the reduction in the number of days of car parking per year which would be permitted from 2017 to 2019. Furthermore, having conducted a site visit himself, Dr Michael has not questioned the findings of the ecology report submitted as part of this application, which concluded that "there is no evidence of any ongoing decline in the diversity of plants of unimproved grassland in the car parking area, and in recent years some evidence in an increase, and that there is no evidence of any ongoing increase in the diversity of plants indicative of disturbed conditions in the car parking area".

In determining previous applications for this site, officers and members have always had to weigh any potential harm to the Downs, against the substantial benefits of reduced congestion and emissions that are gained from allowing parking for a limited number of days each year. It has always been considered that these substantial benefits outweigh any limited harm and this is reflected in permission continuing to be permitted over consecutive applications. The approach being taken by BZG to further reduce the number of days that this area of the downs is utilised can only be viewed in a positive context in this regard. The development plan for Bristol City Council is unchanged from the previous application and as such, this application should be approved without further delay.

IV Impact of parking**(1) Recreation**

4.2 The Zoo's use of the Downs coincides with when people most want to be there: weekends and Bank Holidays from Easter to September and in the school holidays. Because the public is unclear about the Zoo's pattern of use – which is anyway unpredictable – some avoid the site for more than the number of days when parking is permitted and for longer hours than necessary.

DfP suggest "the public is unclear about the Zoo's pattern of use" and "some avoid the site". There is absolutely no evidence to corroborate these broad claims. There is, however, 600 plus letters of support for this application on the Bristol City Council website. The comments of DfP represent a few members of the public, the minority.

BZG will only open the parking area on the site when it is absolutely necessary to do so. Whilst of course busy periods are generally consistent from year to year, BZG do not know exactly which days the use of the site will be required due to weather effects, but in broad terms its use is predictable. It is unlikely that the public may avoid "the site" due to parking, given that over 99% of the Downs is available. Can it be reasonably believed that someone wishing to have a picnic on the downs, for instance, would decide against this because a small percentage is in use on a given day. This is highly unlikely. The amount of public support for the application, again demonstrates that the majority feels it would not prevent using the Downs for recreation.

(2) Landscape and tranquillity

4.3 The Council's planning officers noted in 1998 that: "the car park brings traffic, noise, fumes and visual intrusion into this area of public open space... during the period when the Downs is more likely to be used by the public. The parked cars are clearly visible from the north and west across Ladies' Mile, as well as from closer quarters, introducing an alien element into the attractive landscape of the Downs."

4.4 Nothing has changed since 1998 – the cars can be seen from far away and, because the site is high and exposed, have a significant impact. The zoo makes no attempt to clear the site of cars at 6.30pm so that parking – not only by zoo visitors – goes on longer than permitted.

DfP's comments are highly contradictory. Here, in trying to make the argument that parking on this area of the Downs has a significant impact, DfP suggest that the site is "high and exposed". This is not true. However, earlier within their representation, in trying to emphasise the landscape quality of the site at paragraph 3.4, DfP refer to a previous officer's comments "This area...has a more enclosed character due to low lying scrub dotted with mature trees", going on to state "The second quality of this area is its strong sense of space, together with the visual enclosure and screening afforded by belts of woodland and individual shrubs and trees". These statements appear to conflict with one another. This highlights a rather flawed and inconsistent argument.

(4) Vegetation: the reality

4.11 Similarly, in December 2015 the annual survey found a marked increase in bare soil, which could have been because of the lateness of the survey. (The control area showed a similar increase, partly because of vehicular use - assumed unauthorised - in wet conditions.) On Good Friday 2016, the poor condition of the site and very wet conditions did not stop the zoo using it for parking hundreds of cars, contrary to the agreed protocol. This, together with further unauthorised vehicular use, made the site a waterlogged eyesore, unattractive for walking or any other activity, for the rest of the Easter holidays. The zoo filled the entrances with limestone chippings because of the damage.

4.12 As these examples show, the Downs car park is particularly unsuitable as the main zoo car park at Easter. This is a peak time for visitors but the car park is likely to be unfit to use. On Good Friday 2013, the weather was not good but the zoo's permanent car parks were nonetheless full by 11.30am. Angry and anxious zoo visitors were left roaming the streets looking for somewhere to park. The Ladies Mile site was not used. On Good Friday 2016 the weather was fine. The site was

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not fit to use but the traffic chaos was such, with Bridge Valley Road blocked, that the zoo opened it anyway.

We refer you back to the supporting information submitted with this application which conclusively addresses the points raised at this section of the DfP representation. At paragraph 4.11 above, DfP state "On Good Friday 2016, the poor condition of the site and very wet conditions did not stop the zoo using it for parking hundreds of cars, contrary to the agreed protocol." DfP then go on to state within their following paragraph 4.12 "On Good Friday 2016 the weather was fine. The site was not fit to use but the traffic chaos was such, with Bridge Valley Road blocked, that the zoo opened it anyway." On one hand DfP suggest that the weather on Good Friday 2016 was "very wet" and then on the other hand they suggest it was "fine".

DfP rightly refer to the congestion that arises on busy days if the area is not used, such as Good Friday. It demonstrates the issues that arise if BZG is not able to make use of the area on days of high visitation. Without the parking on the Downs, the congestion would have been worse and lasted longer.

DfP have consistently suggested that BZG disregard their own agreed protocol as and when it suits them. However, from the above, it would appear that this is not in fact the case. "On Good Friday 2013, the weather was not good but the zoo's permanent car parks were nonetheless full by 11.30am. Angry and anxious zoo visitors were left roaming the streets looking for somewhere to park. The Ladies Mile site was not used." In trying to emphasise the impact on the surrounding roads as a result of not opening the Ladies Mile site for car parking, DfP has inadvertently highlighted that BZG does in fact abide by its own agreed parking protocol. We can assure the Council that the protocol is strictly followed.

The DfP representation reproduces what they feel are the national and local planning policies relevant to this application. In attempting to show that the current application contravenes local and national policy, DfP failed to understand how the planning system works. Instead of weighing the resultant benefits against any resultant harm, DfP have instead focused solely on policies that they feel there is some evidenced harm and then come to a conclusion based solely on this interpretation. When determining an application, one must instead weigh the planning balance as a whole, and not individual policies in isolation.

Conclusion

The DfP representation raises no new points that have not already been addressed either via the supporting documents submitted with this application. The DfP representations continue to raise arguments that don't appear to be supported by the wider public, who have overwhelmingly supported this application.

Previous permissions for this site have been granted on the basis that the substantial benefits outweigh any limited harm. Given that there has been no material change to the planning context within the city since the last consent was granted, and that any potential harm will be further reduced by the reduction in days (40 – 30 days) that the use of the site is required, this application should also be approved without further delay.

Yours sincerely



GEORGINA TIBBS
Associate

Downs for People

The Durdham Downs are for people, not for cars.

Application 16/06311/X: zoo parking off Ladies Mile

The zoo's responses to our objections

Summary

1. This paper responds to the zoo's responses to two Downs for People objections.

2. The zoo's responses are disappointing because of :

- **The general approach** . The zoo's consultants write as if the planning application were about the zoo, not the Downs. They appear to assume parking can continue for as long as it suits the zoo, despite the clear breach of protective planning policies and lack of effective action.
- **Major numerical mistakes**. Instead of correcting the mistakes in its earlier documents, the zoo has repeated and magnified them. It has taken another per visit expenditure figure and applied it to every visitor, arriving at a figure that is much too large. It has made this worse by including non-paying visitors. It should not be using aggregate statistics in this way anyway.
- **Unjustified criticism of Downs for People figures**. The zoo suggests that the Groupon offer would not have produced up to 10,000 cars because each car would have contained an average of 3.8 ticket-holders. But 3.8 families cannot fit into one car!. The only other criticism was of a figure put forward tentatively, and again the zoo made a mistake when quoting it.

3. The zoo has sought support on the basis of misleading claims, including:

- **Parking occupies less than half of 1% of the total size of the Downs**. 0.7% in previous applications and 0.6% in the latest correspondence. A 25% (one acre) reduction in size.
- **The zoo is the most popular visitor attraction in Bristol**. It is not, as the zoo accepts in its latest letter. (It is also claiming 600,000 visitors, which would be an unlikely increase).
- **No permanent damage has been caused to the vegetation by parking**. There is damage which will remain as long as parking continues.
- **Without Downs parking the zoo's economic contribution to the city of Bristol would decline by over £2million a year**. The zoo miscalculated: the impact would be negligible.

The zoo needs to correct these claims publicly. The planning officer needs to advise the planning committee not to give weight to the apparent support for the zoo as it is not soundly based.

4. The use of the Downs for zoo parking is clearly contrary to the development plan. If the zoo wishes to argue that other material considerations indicate permission should be given, it must produce *either* a convincing travel plan *or* convincing evidence that loss of parking will have a significant adverse economic impact on the city. ***That needs to start with convincing evidence that the zoo would not be viable. The zoo's £500k loss figure is not credible.***

I. Introduction

1.1 This paper responds to the zoo's responses to two Downs for People objections: objection 2 on transport and travel, and objection 3 on financial and economic issues. The zoo's responses were contained in two letters from its planning agents, Barton Willmore, on 21 and 22 February and in a statement from the Peter Evans Partnership appended to the letter of 21 February.

1.2. The paper covers:

- The consultants' general approach
- Continuing major numerical mistakes
- Unjustified criticism of Downs for People
- Support based on misleading claims.
- Evidence that is needed.

II. The consultants' general approach

2.1. The zoo's consultants have lost sight of what this application is about: it is not about the zoo but about the use of the Downs. The planning policies that protect the Ladies Mile site are very clear: the zoo has been allowed to breach them only on the understanding that it will introduce travel measures to make parking on the Downs unnecessary, quickly. Both Barton Willmore and the Peter Evans Partnership seem to think parking can continue indefinitely without any effective action by the zoo. For example:

- Barton Willmore say (p4 of their letter of 21 February): "Whilst the need to explore alternative options is understandable, these do not form part of our application submission, which should be judged on its own merits and in line with the development plan, along with relevant material considerations." On the final page of that letter they suggest: "One cannot expect the changing of travel behaviour overnight" and end by proposing that "considering the planning context is unchanged" planning permission should again be given as it was in 2013. *But six planning permissions have been granted in the last twenty years on the basis that the zoo **will** provide alternatives, travel behaviour **will** change, and that the need for the car park **will** reduce. – and preferably disappear altogether – between planning applications.*
- The Peter Evans Partnership responds (page 3 of its statement) to criticism that the zoo has taken little action to accommodate the cars it attracts by pointing to the zoo's use of the Ladies Mile car park. ***That's the problem, not the solution.....!!***
- Both consultants point to the reduction in the number of days in the use of the Ladies Mile sites. The Peter Evans Partnership claims this is evidence of a reduction in parking demand for the zoo in the past and a commitment to reduce the number of cars in the future. ***Not so, 80% of zoo visitors came by car in both 1998 and 2016.*** The reduced number of days since 1998 mainly reflects limits imposed by planning committees. In the last two years, there has also been a major increase in available on-road parking in the roads near the zoo and on the Downs. ***The zoo's proposal to reduce the number of days in future is not accompanied by any proposals to significantly reduce parking demand.***

III. Continuing major numerical mistakes

3.1. On the final page of their letter of 21 February, Barton Willmore say: “...one must give great weight to the incredible contribution that BZG makes to the city.” That is presumably why they have produced figures that are even more fantastical than before. The figures are certainly incredible: it is less clear why they should be given any weight at all.

3.2. In our objection on financial and economic issues, we pointed out that the zoo had misapplied figures from the Great Britain Day Visits Survey(GBDVS) . It had applied a per trip/car figure to every visitor to produce a figure that was four times too high. ***Barton Willmore has done just the same again.*** The GBDVS contains information on trips by local authority area and trips by type. Last time the zoo used a figure for Bristol from the 2015 survey: this time they have used a figure from the 2011 survey for zoos and safari parks. Last time they got their figure from Destination Bristol, this time from the British and Irish Association of Zoo's and Aquariums (who also appear confused about per visit and per head figures). Zoo and safari park trips are expensive (£53.50 per trip in 2011 , rather than the Bristol average of £42.39 per trip in 2015) so that the zoo has arrived at higher figures than before.

3.3 To compound the error, the zoo has applied the £53.50 figure to all its visitors, not just those who pay, even though admission fees will be the larger part of the GBDVS figure and local members will not have much additional expenditure. This gives a total contribution to the city of almost £30 million, rather than the £18.6 million quoted by the zoo before. Incredible – especially as we know that most zoo visitors are on long day trips or live locally.. (This is not an *assumption* as Barton Willmore suggest in their letter of 22 February. It is a fact, established in every survey of zoo visitors since 1998). Day visitors to the zoo do not produce significant income for the rest of the city.

3.4. We can understand Destination Bristol wishing to support the zoo, which is presumably one of its members. Nonetheless, its suggestion - contained in Barton Willmore's letter of 22 February - that zoo visitors contribute £2million to the local economy only adds to the confusion in the absence of much explanation. It is not clear whether this figure relates to all zoo visitors or just the users of the Downs car park: it reads as if it is the first. Like the GBDVS figures, statistics based on general Bristol data do not anyway need to be used when zoo visitors have been so well surveyed.

IV. Unjustified criticism of Downs for People

4.1 In their letter of 21 February Barton Willmore suggest the Downs for People representation has “disregard for factual accuracy”. They give two examples:

- **Groupon offer.** 10,000 tickets would not equate to 10,000 cars. Taking account of 3.8 car occupancy would result in circa 2,600 cars. People travelling by alternative means would reduce that number significantly.
- **Car park payments.** The zoo currently pays £40,119.60pa to the Downs Committee for the use of the North Car Park and Ladies Mile , not £24k as stated.

These are poor examples: the first in particular is further evidence of the consultants' inaccuracy and innumeracy, not ours.

Groupon offer

4.2. What we said in para 5.2 of Objection 2 about the Groupon offer was: "...in August 2015 when the zoo sold over 10,000 tickets at half-price. The great majority of these would have been family tickets so that up to 10,000 extra cars will have come to the zoo". **It is not clear why the consultants have instead assumed all the tickets sold were to single adults sharing cars with other single adults.**

4.3. The offer had three types of ticket: adult (£7); adult and child (£11); and family (up to two adults and three children (£25)). Given the zoo is a family attraction, it seems reasonable to assume – as we did – that the majority were family tickets. And many, if not most, of the sales in the other two categories will have been to adults accompanied by babies and toddlers below the age at which admission charges apply. 3.8 families cannot share one car. And with 80% of zoo visitors coming by car, alternative means of transport will not have significantly reduced the traffic generated.

Comment [SC1]:

4.4. The number of extra cars will therefore have been much closer to 10,000 than the 'significantly less than 2,600' estimated by the consultants. This was evident from the scale of traffic problems caused.

Car park payments

4.5. We explained in para 5.3 of objection 2 that the terms of the Downs Committee licences were not readily available. We have been pressing the Downs Committee on this since 2013, when the Committee's annual accounts showed a total zoo payment of £32k. We knew that £8k was paid for Ladies Mile and therefore attributed £24k to the North car park (not both as the consultants suggest). For some time the Downs Committee took no action. We are pleased if an increase has now been negotiated, albeit £8k is too small to affect our argument that the zoo is receiving a generous subsidy. **Again the consultants have mis-quoted figures: the £24k was clearly just for the North car park. The Ladies Mile site was dealt with in the next paragraph of our objection.**

V. Support based on misleading claims.

5.1. The zoo has made repeated approaches to its members, volunteers and others based on misleading and unsubstantiated claims, including:

- **Parking area is less than half of 1% of the total size of the Downs.** We showed in our objection 4 that the zoo appears to have achieved this figure by taking 25% (1 acre) off the size of the site, reducing it from 1.34 hectares to one hectare. Earlier planning applications equated 1.34 hectares to 0.7% of the Downs. In their letter of 21 February, Barton Willmore say that it is 0.6%. **This is more, not less, than half of 1%.**
- **The zoo is the most popular visitor attraction in the city.** We pointed out in our objection 3 that it is not. This is accepted in Barton Willmore's letter of 22 February. Yet in their letter of 21 February they say: "It is undoubtedly the most popular tourist attraction in Bristol, attracting over 600,000 visitors annually". The first part of this statement is untrue and the second is suspect: we have not seen visitor figures for 2016 but they seem unlikely to exceed 600,000. In 2015 the zoo had 546,000 visitors, significantly more than in 2014 because of the Groupon offer. A 10% increase is unlikely. **The zoo is not the most popular visitor attraction in the city and Barton Willmore appear to have exaggerated the visitor numbers.**
- **There is no permanent damage caused to the vegetation by parking.** As we pointed out in objection 4, this is disingenuous. The ecological surveys have shown that parking has damaged the vegetation but recovery may be possible when parking ends. **Damage to the**

vegetation is at least as permanent as the parking, for which the zoo is not offering an end date.

- **Without Downs parking, the zoo's economic contribution to the city of Bristol would decrease by over £2million a year.** Based on mis-applying Great Britain Day Visitor statistics. *The loss to the city would be negligible.*

Our view: the zoo should correct these statements publicly. The planning officer should advise the planning committee in due course not to give weight to the apparent support for the zoo because it is not soundly-based.

VI. Evidence that is needed.

6.1. Six planning committees have been clear that parking on the Downs conflicts with the development plan. This is still the case as Downs for People showed in our fourth objection, on the impact on the Downs.

6.2 If the zoo wishes to argue permission should be granted on the grounds of other material considerations, it needs to produce:

- **A convincing travel plan** to end use of the Downs soon. There is nothing in the Peter Evans Partnership statement to persuade us this exists: improved information and cycle parking plus other enhancements not yet determined (bottom of page 2) do not inspire confidence after fifty years without effective action ; or
- **Convincing evidence that loss of the parking will have a significant adverse economic impact on the city. This needs to start with convincing evidence that the zoo will not be viable.** The zoo's £500k loss figure is not credible. It is the gross income from the car park but not a sensible estimate of potential losses. If the zoo does not like the Downs for People estimate, it needs to provide an alternative. Then it needs to show clearly how this will affect viability and the city.

VII Conclusions

7.1. The zoo's responses are of a similar standard to its application. On transport and travel, it has produced a lot of words, which simply confirm that it is not committed to any action to reduce the number of cars it attracts. ***The zoo is promising only to reduce the number of days it uses the Ladies Mile site. In the absence of an effective travel plan, this will produce additional traffic chaos.***

7.2. As for its response on financial and economic issues, the zoo and/or its consultants continue to mis-apply statistics. They do not need to draw on average statistics from the Great Britain Day Visits Survey or from Destination Bristol because travel surveys have been undertaken annually at the zoo since 1998 as a condition of its planning permissions. In 2009 an additional large survey was undertaken at the Ladies Mile site. The average statistics are anyway not intended to be disaggregated but to give an overall picture.

7.3. Once it has a figure, the zoo exaggerates or reduces it as suits its purpose. If it is too large, like the size of the car park, the zoo rounds it down. If it is too small, like (we suspect) the number of visitors, the zoo rounds it up. This is misleading given the scale of the rounding. It is not as arithmetically incorrect as the zoo's use of average car occupancy. If a figure is too low, like zoo

visitors' expenditure, it multiplies it by 3.8 or similar. If too high, like the number of cars attracted by the Groupon offer, it divides by 3.8. ***The zoo does not differentiate properly between figures per visitor and figures per car.***

7.4. Overall these responses are disappointing: we hoped the zoo would correct its figures, not repeat its mistakes.

Downs for People

27 February 2017

BRISTOL
CAMBRIDGE
CARDIFF
EBBSFLEET
EDINBURGH
LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOLIHULL
SOUTHAMPTON

**BARTON
WILLMORE**

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101 Victoria Street
Bristol
BS1 6PU
T/0117 929 9677

Paul Chick
Bristol City Council
Planning Department
City Hall
PO Box 3176
Bristol
BS3 9FS

Our Ref: 26412/A3/SE/jmm

16th March 2017

Dear Paul

**16/06311/X LAND OFF LADIES MILE APPLICATION FOR CONTROLLED OVERFLOW
PARKING: RESPONSE TO DOWNS FOR PEOPLE CONSULTATION RESPONSE - THE ZOO'S
RESPONSES TO OUR OBJECTIONS**

Further to our recent correspondence in relation to parking at Ladies Mile, please accept this as our formal response to the consultation comments received from Downs for People (DfP) – 'The zoo's responses to our objections'. This follows our responses to objection 2 relating to transport and travel, objection 3 relating to finance and economic issues, and objection 4 relating to The Impact on the Downs.

For ease, I include the comments made by DfP (in italics), followed by our response in standard text.

- ***The general approach.*** *The zoo's consultants write as if the planning application were about the zoo, not the Downs. They appear to assume parking can continue for as long as it suits the zoo, despite the clear breach of protective planning policies and lack of effective action.*

BZG make no such assumptions and is taking positive steps to reduce usage. This is reflected in the reduction in the number of days per year that the site is used for. How can there be a "clear breach of protective planning policies" when planning permission has been granted. Over 600 members of the public, business groups and the local MP appear to disagree with this opinion.

- ***Major numerical mistakes.*** *Instead of correcting the mistakes in its earlier documents, the zoo has repeated and magnified them. It has taken another per visit expenditure figure and applied it to every visitor, arriving at a figure that is much too large. It has made this worse by including non-paying visitors. It should not be using aggregate statistics in this way anyway.*

Statistics are based on aggregate figures the world over. The "per visitor expenditure figure" is based on an average spend per visitor. We reiterate that there is no such thing as a non-paying visitor to BZG. Visitors either pay on the gate or through their membership.

- ***Unjustified criticism of Downs for People figures.*** *The zoo suggests that the Groupon*



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Number: 06762692

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RG1 2UE
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offer would not have produced up to 10,000 cars because each car would have contained an average of 3.8 ticket-holders. But 3.8 families cannot fit into one car! The only other criticism was of a figure put forward tentatively, and again the zoo made a mistake when quoting it.

3. The zoo has sought support on the basis of misleading claims, including:

- ***Parking occupies less than half of 1% of the total size of the Downs.*** 0.7% in previous applications and 0.6% in the latest correspondence. A 25% (one acre) reduction in size.

We have addressed this in our recent correspondence. The site area is 1.344ha. We believe that the Downs as a whole covers an area of circa 182.11ha, however this is very difficult to quantify. This would result in the site taking up approximately 0.7% of the Downs. We invite the council to do their own calculations in order to verify our figures.

- ***The zoo is the most popular visitor attraction in Bristol.*** *It is not, as the zoo accepts in its latest letter. (It is also claiming 600,000 visitors, which would be an unlikely increase).*

As per the 2015 figures, there was little difference between BZG and M SHED. The only difference being that BZG pays its own way and consequently makes a huge financial contribution to the wider city as set out in our previous correspondence.

- ***No permanent damage has been caused to the vegetation by parking.*** *There is damage which will remain as long as parking continues.*

We refer you to the ecology survey submitted as part of the application and the comments of the Council's own Nature Conservation officer, Dr Nick Michael's.

- ***Without Downs parking the zoo's economic contribution to the city of Bristol would decline by over £2million a year.*** *The zoo miscalculated: the impact would be negligible.*

We stand by our previous representations which suggest that the loss to the City would be in excess of £2million a year.

4. The use of the Downs for zoo parking is clearly contrary to the development plan. If the zoo wishes to argue that other material considerations indicate permission should be given, it must produce either a convincing travel plan or convincing evidence that loss of parking will have a significant adverse economic impact on the city. That needs to start with convincing evidence that the zoo would not be viable. The zoo's £500k loss figure is not credible.

We have set out previously why we feel the use of the Downs for zoo parking is not contrary to the development plan. A travel plan is already in place and has been for a number of years. This has always been prepared and revised, as necessary, in collaboration with Bristol City Council. We note that there has been no objection to the application from either the council's Landscape Officer or the council's Nature Conservation Officer. The wider contribution that the zoo makes both on a recreational basis, as well as a financial basis, are material considerations.

II. The consultants' general approach

2.1. The zoo's consultants have lost sight of what this application is about: it is not about the zoo but about the use of the Downs. The planning policies that protect the Ladies Mile site are very clear: the zoo has been allowed to breach them only on the understanding that it will introduce travel measures to make parking on the Downs unnecessary, quickly. Both Barton Willmore and the Peter Evans Partnership seem to think parking can continue indefinitely without any effective action by the zoo. For example:

- *Barton Willmore say (p4 of their letter of 21 February): "Whilst the need to explore alternative options is understandable, these do not form part of our application submission, which should be judged on its own merits and in line with the development plan, along with relevant material considerations." On the final page of that letter they suggest: "One cannot expect the changing of travel behaviour overnight" and end by proposing that "considering the planning context is unchanged" planning permission should again be given as it was in 2013. But six planning permissions have been granted in the last twenty years on the basis that the zoo **will** provide alternatives, travel behaviour **will** change, and that the need for the car park **will** reduce – and preferably disappear altogether – between planning applications.*
- *The Peter Evans Partnership responds (page 3 of its statement) to criticism that the zoo has taken little action to accommodate the cars it attracts by pointing to the zoo's use of the Ladies Mile car park. **That's the problem, not the solution.....!!***
- *Both consultants point to the reduction in the number of days in the use of the Ladies Mile sites. The Peter Evans Partnership claims this is evidence of a reduction in parking demand for the zoo in the past and a commitment to reduce the number of cars in the future. **Not so, 80% of zoo visitors came by car in both 1998 and 2016.** The reduced number of days since 1998 mainly reflects limits imposed by planning committees. In the last two years, there has also been a major increase in available on-road parking in the roads near the zoo and on the Downs. **The zoo's proposal to reduce the number of days in future is not accompanied by any proposals to significantly reduce parking demand.***

We reiterate that BZG has not at any time "breached" either planning policy or any planning permission. BZG use the site only when absolutely necessary. This is supported by the fact that they have underutilised the site when compared against the amount of days permitted, over a consecutive number of years.

In our previous representations we highlighted that the number of days that the site is used has reduced dramatically from 80 days a year in 1998 to the proposed 40, 35, and 30 days a year over the next 3 years. We have also set out the efforts that BZG have gone-to to promote sustainable modes of transport and reduce car dependency, which has been recognised by the Silver Accreditation award. With this in mind, it is wholly unreasonable to infer that BZG has not provided alternatives, travel behaviour has not changed, and that there has not been a reduction in the use of the site for car parking.

We stand by our previous statement: "One cannot expect the changing of travel behaviour overnight, from dependency on the private car, which is a national, potentially international issue. To end the use of Ladies Mile for overflow parking prematurely would be short-sighted considering its use is reducing. The result of which would see visitors given more incentive to visit alternative attractions locally where there is free parking available on-site. This will be seen as the 'easier option' for visitors and lead to greater private car usage in and around Bristol, negating the positive progress made at the Zoo".

III. Continuing major numerical mistakes

3.1. *On the final page of their letter of 21 February, Barton Willmore say: "...one must give great weight to the incredible contribution that BZG makes to the city. " That is presumably why they have produced figures that are even more fantastical than before. The figures are certainly incredible: it is less clear why they should be given any weight at all.*

3.2. *In our objection on financial and economic issues, we pointed out that the zoo had misapplied figures from the Great Britain Day Visits Survey (GBDVS). It had applied a per trip/car figure to every visitor to produce a figure that was four times too high. Barton*

Willmore has done just the same again. The GBDVS contains information on trips by local authority area and trips by type. Last time the zoo used a figure for Bristol from the 2015 survey; this time they have used a figure from the 2011 survey for zoos and safari parks. Last time they got their figure from Destination Bristol, this time from the British and Irish Association of Zoos and Aquariums (who also appear confused about per visit and per head figures). Zoo and safari park trips are expensive (£53.50 per trip in 2011, rather than the Bristol average of £42.39 per trip in 2015) so that the zoo has arrived at higher figures than before.

3.3 To compound the error, the zoo has applied the £53.50 figure to all its visitors, not just those who pay, even though admission fees will be the larger part of the GBDVS figure and local members will not have much additional expenditure. This gives a total contribution to the city of almost £30 million, rather than the £18.6 million quoted by the zoo before. Incredible – especially as we know that most zoo visitors are on long day trips or live locally... (This is not an assumption as Barton Willmore suggest in their letter of 22 February. It is a fact, established in every survey of zoo visitors since 1998). Day visitors to the zoo do not produce significant income for the rest of the city.

3.4. We can understand Destination Bristol wishing to support the zoo, which is presumably one of its members. Nonetheless, its suggestion - contained in Barton Willmore's letter of 22 February - that zoo visitors contribute £2million to the local economy only adds to the confusion in the absence of much explanation. It is not clear whether this figure relates to all zoo visitors or just the users of the Downs car park; it reads as if it is the first. Like the GBDVS figures, statistics based on general Bristol data do not anyway need to be used when zoo visitors have been so well surveyed.

We stand by our previous representations and those of Destination Bristol, which set out the financial loss to BZG and the city of Bristol, should the site not be used for car parking. In their consultation response Objection 3: Financial and Economic, DfP include on their penultimate page a table setting out their reasoning for the difference between the two parties figures. With unsubstantiated reasons such as "Not all users pay and most will continue to come" and "Zoo figure based on misapplied statistic. Car park users don't spend anything elsewhere". It is the difference between fact (BZG) and assumption (DfP).

IV. Unjustified criticism of Downs for People

4.1 In their letter of 21 February Barton Willmore suggest the Downs for People representation has "disregard for factual accuracy". They give two examples:

- ***Groupon offer.*** *10,000 tickets would not equate to 10,000 cars. Taking account of 3.8 car occupancy would result in circa 2,600 cars. People travelling by alternative means would reduce that number significantly.*
- ***Car park payments.*** *The zoo currently pays £40,119.60pa to the Downs Committee for the use of the North Car Park and Ladies Mile, not £24k as stated. **These are poor examples: the first in particular is further evidence of the consultants' inaccuracy and innumeracy, not ours.***

Groupon offer

*4.2. What we said in para 5.2 of Objection 2 about the Groupon offer was: "...in August 2015 when the zoo sold over 10,000 tickets at half-price. The great majority of these would have been family tickets so that up to 10,000 extra cars will have come to the zoo". **It is not clear why the consultants have instead assumed all the tickets sold were to single adults sharing cars with other single adults.***

4.3. The offer had three types of ticket: adult (£7); adult and child (£11); and family (up to two adults and three children (£25)). Given the zoo is a family attraction, it seems reasonable to assume – as we did – that the majority were family tickets. And many, if not most, of the sales in the other two categories will have been to adults accompanied by babies and toddlers below the age at which admission charges apply. 3.8 families cannot share one car. And with 80% of zoo visitors coming by car, alternative means of transport will not have significantly reduced the traffic generated.

4.4. The number of extra cars will therefore have been much closer to 10,000 than the 'significantly less than 2,600' estimated by the consultants. This was evident from the scale of traffic problems caused.

The effect of the Groupon offer is extremely difficult to quantify, not least because it is impossible to know how many of those guests that purchased tickets would have visited BZG irrespective of the offer. Nonetheless, BZG continue to reiterate that they have no intention of replicating the offer at this moment in time.

Car park payments

4.5. We explained in para 5.3 of objection 2 that the terms of the Downs Committee licences were not readily available. We have been pressing the Downs Committee on this since 2013, when the Committee's annual accounts showed a total zoo payment of £32k. We knew that £8k was paid for Ladies Mile and therefore attributed £24k to the North car park (not both as the consultants suggest). For some time the Downs Committee took no action. We are pleased if an increase has now been negotiated, albeit £8k is too small to affect our argument that the zoo is receiving a generous subsidy. **Again the consultants have mis-quoted figures: the £24k was clearly just for the North car park. The Ladies Mile site was dealt with in the next paragraph of our objection.**

As per our previous representations, BZG pays £40,119.60 to the Downs Committee for the use of the North Car Park and Ladies Mile, which was only used for 41 days in 2016. We reiterate that BZG do not receive any type of subsidy and to infer otherwise is disingenuous. This income contributes to the upkeep of the Downs as a whole, it has been agreed with the Downs Committee and they continue to support this application.

V. Support based on misleading claims.

5.1. The zoo has made repeated approaches to its members, volunteers and others based on misleading and unsubstantiated claims, including:

- **Parking area is less than half of 1% of the total size of the Downs.** We showed in our objection 4 that the zoo appears to have achieved this figure by taking 25% (1 acre) off the size of the site, reducing it from 1.34 hectares to one hectare. Earlier planning applications equated 1.34 hectares to 0.7% of the Downs. In their letter of 21 February, Barton Willmore say that it is 0.6%. **This is more, not less, than half of 1%.**

We have addressed this in our recent correspondence.

- **The zoo is the most popular visitor attraction in the city.** We pointed out in our objection 3 that it is not. This is accepted in Barton Willmore's letter of 22 February. Yet in their letter of 21 February they say: "It is undoubtedly the most popular tourist attraction in Bristol, attracting over 600,000 visitors annually". The first part of this statement is untrue and the second is suspect: we have not seen visitor figures for 2016 but they seem unlikely to exceed 600,000. In 2015 the zoo had 546,000 visitors, significantly more than in 2014 because of the Groupon offer. A 10% increase is unlikely. **The zoo is not the most popular visitor attraction in the city and Barton Willmore appear to have**

exaggerated the visitor numbers.

As per the 2015 figures, there was little difference between BZG and M SHED. The only difference being that BZG pays its own way and consequently makes a huge financial contribution to the wider city as set out in our previous correspondence.

- ***There is no permanent damage caused to the vegetation by parking.*** As we pointed out in objection 4, this is disingenuous. The ecological surveys have shown that parking has damaged the vegetation but recovery may be possible when parking ends. ***Damage to the vegetation is at least as permanent as the parking, for which the zoo is not offering an end date.***

We refer you to the ecology survey submitted as part of the application and the comments of the Council's own Nature Conservation officer, Dr Nick Michael's.

- ***Without Downs parking, the zoo's economic contribution to the city of Bristol would decrease by over £2million a year.*** Based on mis-applying Great Britain Day Visitor statistics. ***The loss to the city would be negligible.***

We stand by our previous representations and those of Destination Bristol, which set out the financial loss to BZG and the city of Bristol should the use of the site for car parking not be available. The final point is wholly speculative and based on assumptions such as "Car park users don't spend anything elsewhere".

VI. Evidence that is needed.

6.1. Six planning committees have been clear that parking on the Downs conflicts with the development plan. This is still the case as Downs for People showed in our fourth objection, on the impact on the Downs.

6.2 If the zoo wishes to argue permission should be granted on the grounds of other material considerations, it needs to produce:

- ***A convincing travel plan to end use of the Downs soon.*** There is nothing in the Peter Evans Partnership statement to persuade us this exists; improved information and cycle parking plus other enhancements not yet determined (bottom of page 2) do not inspire confidence after fifty years without effective action ; ***or***

A travel plan is already in place and has been for a number of years. This has always been prepared and revised, as necessary, in collaboration with Bristol City Council.

- ***Convincing evidence that loss of the parking will have a significant adverse economic impact on the city.*** This needs to start with convincing evidence that ***the zoo will not be viable.*** The zoo's £500k loss figure is not credible. It is the gross income from the car park but not a sensible estimate of potential losses. If the zoo does not like the Downs for People estimate, it needs to provide an alternative. Then it needs to show clearly how this will affect viability and the city.

We draw your attention to your own previous correspondence of 25th January in which you yourself suggest the "potential loss" could be higher at £631,000.

VII Conclusions

7.1. The zoo's responses are of a similar standard to its application. On transport and travel, it has produced a lot of words, which simply confirm that it is not committed to any action to reduce the number of cars it attracts. ***The zoo is promising only to reduce the number of days it uses the Ladies Mile site. In the absence of an effective travel plan, this will produce***

additional traffic chaos.

There is an effective travel plan in place, which is being updated in collaboration with officers. The use of the site has reduced dramatically over the last 20 years and will continue to do so as visitor travel habits change, with less dependency on the private car. In the interim, it should be noted that BZG benefits from an impressively high car occupancy rate of around 3.4 persons, which in itself is considered sustainable transport.

7.2. As for its response on financial and economic issues, the zoo and/or its consultants continue to mis-apply statistics. They do not need to draw on average statistics from the Great Britain Day Visits Survey or from Destination Bristol because travel surveys have been undertaken annually at the zoo since 1998 as a condition of its planning permissions. In 2009 an additional large survey was undertaken at the Ladies Mile site. The average statistics are anyway not intended to be disaggregated but to give an overall picture.

*7.3. Once it has a figure, the zoo exaggerates or reduces it as suits its purpose. If it is too large, like the size of the car park, the zoo rounds it down. If it is too small, like (we suspect) the number of visitors, the zoo rounds it up. This is misleading given the scale of the rounding. It is not as arithmetically incorrect as the zoo's use of average car occupancy. If a figure is too low, like zoo visitors' expenditure, it multiplies it by 3.8 or similar. If too high, like the number of cars attracted by the Groupon offer, it divides by 3.8. **The zoo does not differentiate properly between figures per visitor and figures per car.***

The consideration of this application is unlikely to be influenced by the difference between 0.5% and 0.7% (the size of the site as a percentage of the Downs), or 550,000 and 600,000 (the annual number of visitors).

7.4. Overall these responses are disappointing: we hoped the zoo would correct its figures, not repeat its mistakes.

We stand by our previous representations and the application that has been submitted. DfP is a group of a few individuals and should be viewed as one objector. Nonetheless, we have taken the time to respond to their comments. The responses prepared on behalf of BZG may assist the council in its determination, albeit the comments raised are largely not planning considerations. Again there is significant support from the general public (over 650 people), business groups, and the local MP, as evidence on the Bristol City Council website. The views of the majority should be given great weight.

Yours sincerely

GEORGINA TIBBS
Associate

Encl.

Downs for People

The Durdham Downs are for people, not for cars.

Application 16/06311/X: zoo parking off Ladies Mile

The zoo's response to our response.

Downs for People is an informal organisation set up in 2013 to co-ordinate action to stop Bristol Zoo parking on the Downs. We want all the people of Bristol to enjoy all the Downs, all year round.

Summary

1. This paper looks at the zoo's response of 16 March to criticisms of its approach and misleading claims. ***The zoo's response is extraordinary: it is unwilling to correct facts it accepts are wrong, and is standing by financial estimates based on numerical mistakes and false assumptions. It misrepresents the findings of ecological surveys.***

Facts the zoo accepts are wrong

2. The zoo accepts - tacitly - that it got the following facts wrong:

- 1) **size of site.** 1.344 ha, not 1 hectare, a difference of an acre. This is 0.7% of the Downs, not less than half of 1%.
- 2) **traffic generated by 2015 Groupon offer.** Far more than 2,600 cars.
- 3) **popularity of the zoo.** It is not the most popular visitor attraction in the city – M Shed is.
- 4) **number of visitors.** Not 600,000 a year. Probably less than 550,000.

The zoo says these mistakes do not matter, and is continuing to use statistics it knows are wrong.

Other 'alternative facts'

3. The zoo is standing by its estimates of its economic contribution to the city (£18.6 million or £30million) and the potential loss from the loss of Downs parking (£2million). ***Among many flaws, these are four times too high because the zoo has used per group/car figures as per person ones.***

4. The zoo is also standing by its estimate of a £500k loss to the zoo. ***This figure needs to be reduced to take account of car park users who are zoo members (who do not pay for admission) and the 83% of zoo visitors who say they would visit anyway.***

5. The zoo insists that parking has not permanently damaged the vegetation on the site. Yet ecological surveys show damage that cannot be repaired as long as parking continues.

Silly and untrue statements

6. The rest of the zoo's response contains statements that are silly, untrue, or both, about planning policies and permissions, travel, and statistics.

Overall, this is not the sort of response one would expect from a well-known conservation charity.

Introduction

1. This paper looks at the zoo's response to criticisms from Downs for People, submitted on 27 February, of its general approach to the planning application and its misleading claims. The zoo's response was contained in a letter on 16 March from its agents Barton Willmore.
2. The Barton Willmore letter follows the order of the Downs for People comments. This makes it hard to pick out:
 - 1) points the zoo accepts it got wrong;
 - 2) points the zoo refuses to accept it got wrong;
 - 3) silly and untrue statements

The paper looks at each of these in turn.

Points the zoo accepts it got wrong

3. The zoo accepts that the following points it made earlier are wrong:
 - 5) **size of site.** This is 1.344 ha, not 1 hectare as the zoo claimed ie a third more. This is a difference of one acre. The site is therefore 0.7% of the Downs, not less than half of 1% as the zoo has said repeatedly. It is a much higher percentage of the usable grassland.
 - 6) **traffic generated by 2015 Groupon offer.** The zoo tacitly accepts that the 10,000 plus Groupon tickets will have generated far more than 2,600 additional cars (because most Groupon tickets were for families, not for individuals). The zoo now says that the effect of the Groupon offer is difficult to quantify. It is not *that* difficult: the Zoo's annual accounts for 2015 show that over 30,000 more people paid to visit the zoo in 2015 than in 2014. The accounts attribute this increase mainly to the Groupon offer. 30,000 people will need up to 10,000 cars, as we originally suggested, not 2,600 as the zoo counter-claimed.
 - 7) **popularity of the zoo.** The zoo accepts that it is not the most popular visitor attraction in the city – M Shed is.
 - 8) **number of visitors.** Not 600,000 a year as the zoo claimed. Only 546,000 in 2015 despite the Groupon offer.
4. The zoo has neither apologised nor corrected these mistakes. Instead they claim the mistakes do not matter, and they repeat some in their latest publicity, circulated widely on 12 April. An acre of the Downs and 50,000 visitors are apparently unimportant (last page of the Barton Willmore letter).

Points the zoo refuses to accept it got wrong

(1) Financial estimates of loss to the city

5. Astonishingly, the zoo is standing by its exaggerated financial estimates based on major numerical mistakes. On the first page of their letter Barton Willmore assert:
 - *the “per visitor expenditure figure” is based on an average spend per visitor.* This is not true. The zoo's per visitor figures are based on the Great Britain Day Visits Survey (GBDVS).

This survey contains figures for expenditure by a whole group, not by each person in that group. Do the consultants really believe the average family on a day trip to a zoo in 2011 spent over £200 (their figure) rather than £53.50 (the GBDVS figure)?

- ***there is no such thing as a non-paying visitor to BZG. Visitors either pay on the gate or through their membership.*** That's the point: for a particular visit non-members pay and members don't. It is a difference the zoo recognises in its accounts, which distinguish between 'total guest numbers' and 'paid attendance' (546,000 and 394,000 respectively in 2015). The zoo will not lose over £40 in revenue from admission fees if a family of members does not visit on a particular day, as Barton Willmore assume. Nor will members be paying £53.50 per visit (the GBDVS figure), let alone over £200 as Barton Willmore have assumed.

6. The zoo says that it is standing by its previous representations which suggest a ***loss to the City in excess of £2million a year from the loss of Downs parking*** (page 2 of the Barton Willmore letter). As we showed in our objection 3, the zoo's calculation is wrong: it is based on mis-use of the GBDVS data and assumptions that are either false or highly improbable about loss of custom and expenditure elsewhere in the city (see paras 9 and 10 below).

7. The zoo seeks to associate Destination Bristol with its estimates (page 4 of Barton Willmore's letter). The Destination Bristol estimate of a £2million contribution to the local economy (quoted in Barton Willmore's letter of 22 February) has, however, been derived differently. It appears to relate to the contribution of all zoo visitors, not just users of the Downs car park ie it is probably equivalent to the zoo's exaggerated estimates of an £18.6 million or £30 million contribution to the city.

8. Destination Bristol would find it hard to support the way the zoo has used GBDVS statistics. Their Head of Tourism confirmed in January that the GBDVS figures are per trip, not per person.

(2) Financial estimate of loss to the zoo

9. Barton Willmore is similarly standing by its estimated £500k loss to the zoo from loss of Downs parking. They claim that the Downs for People reasons for suggesting such a loss would not be realised – that "Not all users pay and most will continue to come" – are unsubstantiated. According to the zoo: "It is the difference between fact (BZG) and assumption (DfP)."

10. The reverse is the case: the zoo's figure of £500k ***assumes*** that all the users of the Downs car park pay for admission on the day and that none would continue to come. ***In fact***, as we showed in section IV of our objection 3, many users of the car park are zoo members who do not pay for admission and the evidence from the zoo's own surveys is that 83% of car park users would continue to come. ***The loss is more likely to be about £100k, less if the zoo took action to provide attractive transport alternatives.***

(3) Vegetation damage

11. We referred to the ecological surveys that show parking has damaged the vegetation. The zoo's response is to simply refer to the same surveys and to the comments by the council's Nature Conservation Officer. The zoo does not explain what parts of the surveys or the comments contradict our statement that damage will be at least as permanent as the parking. They couldn't: successive annual surveys have stated that past parking has caused damage and that remedial works cannot be undertaken until parking ends.

Silly and untrue statements

12. As well as clinging to ‘alternative facts’, Barton Willmore’s letter contains a number of statements that are either silly or untrue, or both.

(1) Planning policies and permissions

13. The Barton Willmore letter makes three related points about the planning context:

- (1) *How can there be a “clear breach of protective planning policies” when planning permission has been granted?*

Our Objection 4 set out in detail how zoo parking on the Downs contravenes a host of development plan policies intended to protect the site as an Important Open Space; Site of Nature Conservation Interest; Local Historic Park and Garden; and Conservation Area. That is why only **temporary** permissions have been given, and those reluctantly. Planning permission has been granted because transport and travel issues have been judged a sufficiently offsetting material consideration.

- (2) *We [Barton Willmore] re-iterate that BZG has not at any time “breached” either planning policy or any planning permission.*

An odd claim about an organisation that long ignored the need for planning permission altogether; that afterwards often used the site without permission; and that has frequently failed to comply with planning conditions and obligations. (Breaches of planning policy have already been dealt with). The zoo failed to apply for permission until the council took enforcement action in 1997. Of the twenty parking seasons since then, nine have not been fully covered by planning permission, mainly because the zoo applied too late. This year will be the tenth such season: the zoo has been using the site since 10 April without planning permission.

The zoo has frequently breached the terms of its planning permissions by:

- Parking on a larger area than permitted
- Parking for longer hours than permitted
- Leaving the car park unattended
- Failing to undertake necessary repairs
- Failing to undertake ecological surveys as required
- Failing to undertake travel surveys at comparable times each year.

- (3) *We [Barton Willmore] have set out previously why we feel the use of the Downs for zoo parking is not contrary to the development plan.*

We cannot find this set out clearly anywhere. In their letter of 21 February Barton Willmore claimed that the size of the site meant that harm to the overall area as an important recreational Open Space was not ‘material’. The location of the site helped to reduce any harm to the area as an historic landscape. Their later letter of 7 March said that: “BZG has at no point inferred that the area of the downs that is used for parking is ‘small and unimportant’ “. It is therefore unclear why they feel zoo parking is not contrary to the development plan.

(2) Travel

14. Barton Willmore's statements in relation to travel are similarly confused. In particular, they say:

(1) It is wholly unreasonable to infer that BZG has not provided alternatives, travel behaviour has not changed, and that there has not been a reduction in the use of the site for car parking.

No one disputes that there has been a reduction in the use of the site for car parking: planning committees have required this and the increased availability of on-road parking has helped to make it possible in the last two years. **But** this reduction has not been caused by alternatives provided by BZG and travel behaviour has not changed significantly: 80% of zoo visitors came by car in both 1998 and 2016

(2) One cannot expect the changing of travel behaviour overnight, from dependency on the private car, which is a national, potentially international issue.

Nonsense. People are quick to find alternatives. For example, car use dropped at once when a congestion charge was introduced in London. Almost 30,000 people came to the Massive Attack concert on the Downs last September without causing traffic problems because they knew there was no parking. On the other hand, allowing the zoo to park on the Downs has meant there has been no reason for people to reduce their car dependency, which has instead increased enormously over the last fifty years.

(3) Ending Ladies Mile parking would lead to visitors going to alternative attractions with free parking, leading to greater private car usage in and around Bristol.

Hard to see how this would happen. The other major tourist attractions in Bristol are all more central than the zoo, mainly on the Harbourside. They do not have free parking and many more of their visitors use public transport. Likewise the many attractions in Bath. Diversion to these attractions is more likely to reduce than increase cars in and around Bristol.

The zoo's own Wild Place and Noah's Ark Zoo Farm do have free parking. Since both attractions are in the direction from which most zoo visitors come, a loss of custom to them would again probably reduce, not increase, traffic in and around Bristol.

(3) Statistics

15. In response to our criticism of their applying aggregate figures from the Great Britain Day Visits Survey (GBDVS) to the zoo, Barton Willmore responded:

"Statistics are based on aggregate figures the world over."

This is true: we were not questioning the Great Britain Day Visits Survey findings, based on aggregate figures, that an average day trip to Bristol cost £42.39 in 2015 and an average trip to a zoo or safari park in Great Britain cost £53.50 in 2011.

16. What we questioned was inferring from these figures that **a trip to Bristol Zoo** cost either £42.39 or £53.50. The GBDVS figures cover a wide range of destinations with a correspondingly wide range of costs. There is no need to infer what a trip to Bristol Zoo costs when we have exact figures in the zoo's annual accounts. Nor is there any advantage to the zoo: we showed in our objection 3 that the total spend per car for paying guests in 2015 was £57.34, significantly more than

the £42.39 average for Bristol. (Barton Willmore mistakenly multiplied the £42.39 by four because they misunderstood the GBDVS figures. That is an issue dealt with in para 5 above).

Conclusions

17. This is an extraordinary document to be submitted on behalf of a charity and well-known organisation. The zoo appears not to care that it has sought support for its planning application on the basis of facts that it accepts are wrong: indeed it is still using those 'facts'. Nor has the zoo accepted that its financial estimates are based on a misinterpretation of data in the Great Britain Day Visits Survey, even though the zoo's interpretation flies in the face both of common sense and advice from *Destination Bristol*.

18. Equally extraordinary, especially for a conservation organisation, is the zoo's insistence that parking has not permanently damaged the vegetation on the site. There is damage that cannot be repaired as long as parking continues. Since the zoo has no plans to stop using the site, the damage will be permanent unless permission is refused. The zoo is playing with words.

19. The rest of the Barton Wilmore letter contains statements and assertions that serve only to confuse the issues. The intention is presumably to distract attention from the main point: zoo parking on the Downs is contrary to the development plan and permission should therefore be refused. There are no other material considerations that would justify granting permission. Barton Willmore appear to acknowledge this in the last paragraph of their letter where they say that "the comments raised are largely not planning considerations".

Downs for People

17 April 2017

8.0 SUMMARY ACTION PLAN

8.1.1 The timetable of the measures proposed and the timescale for implementation is set out below:

Staff Travel			
Travel Mode	Measure	Timescale	Implemented By...
General Marketing	Travel information provided to new staff	Ongoing	TPC
	Staff Travel Information Board and Leaflets	Ongoing	TPC
	Travel information on intranet	Ongoing	TPC/Marketing Team
	Travel info via emails	Ongoing	TPC
	Travel Roadshow	Next roadshow proposed summer 2017 – date TBC	TPC
Walking/Cycling	Covered/secure cycle parking	In place	TPC/Maintenance Team
	Showers, Lockers, Changing areas	In place	Maintenance Team
	Staff Cycle to Work Scheme	Ongoing	TPC/HR
	Cycle Champion	Ongoing - New Champion appointed March 2017	TPC
	Reflective Vests	Ongoing	TPC
	Cycle discount with local cycle shop	Ongoing	TPC
	Cycle Mileage Rate for Business	Ongoing	TPC/HR
	Electric Bike Trial	Proposed Summer 2017	TPC/TravelWest
	Cycle/Walk Breakfast	Proposed Summer 2017	TPC
	Bike User Group	Determine interest in Spring/Summer 2017	TPC/Cycle Champion
	Additional cycle spaces	Annual review	TPC/ Management
Bus/Train Travel	Salary sacrifice for annual bus passes	Ongoing	TPC/HR

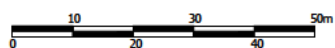
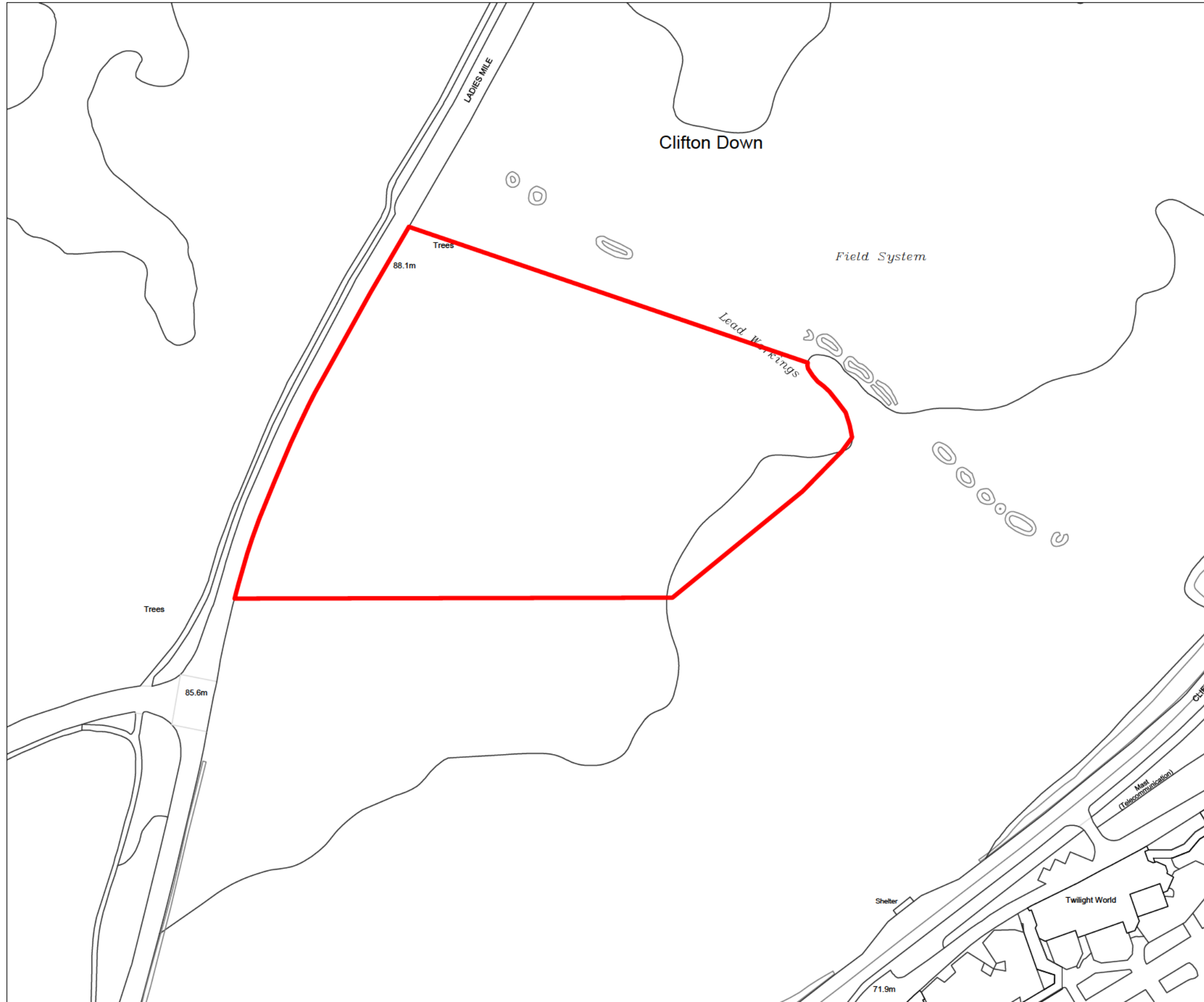
Car & M/C	Car Share Scheme	Ongoing – currently being updated	TPC/HR
	Car Parking Permit System	Ongoing	TPC/HR
	Electric Car Charge Bays	In place	TPC/Maintenance Team
	Motorcycle Parking Spaces	In place	TPC/Maintenance Team
	Additional M/C, car share, electric spaces	Annual review	TPC/ Management
Monitoring	Green Team meetings	Ongoing	Green Team
	Annual travel survey	Annually each March/April	TravelWest
	Travel Plan Monitoring Report	Within 2 months of survey	TPC/TravelWest

Guest Travel			
Travel Mode	Measure	Timescale	Implemented By...
General Marketing	Travel information on website	Ongoing – and updated as required	TPC/Marketing Team
	Leaflets at reception	May 2017	TPC
	Travel info on social media at peak times	Ongoing	TPC/Marketing Team
	Travel info to members via e-letters	Ongoing	TPC/Marketing Team
	Travel Roadshow	Next roadshow proposed summer 2017 – date TBC	TPC/TravelWest
	Marketing on 3 rd party websites (GWR, First etc)	Under discussions	TPC/Marketing Team
Walking/Cycling	Covered cycle parking	In place	TPC/Maintenance Team
	33% off entry for cyclists (non-members)	Ongoing	TPC/Marketing Team
	£5 off renewal membership for members cycling	Ongoing	TPC/Marketing Team
	Additional cycle spaces	Annual review	TPC/ Management
Bus/Train Travel	33% off entry for bus/train passengers	Ongoing	TPC/Marketing Team
	2for1 entry for GWR train passengers	Ongoing	TPC/Marketing Team
	£5 off renewal membership for members using bus	Launch late April 2017	TPC/Marketing Team
	RTPI screens	In place, with additional locations being considered Spring/Summer 2017	TPC
	Coach drop off location	In place	Guest Services

Car & M/C	33% off entry for P&R users	Ongoing	TPC/Marketing Team
	Charges in car park	Ongoing	Guest Services
	Electric Car Charge Points	In place	TPC/Maintenance Team
	Disabled Parking Spaces	In place	TPC/Maintenance Team
	Additional M/C, car share, electric spaces	Annual review	TPC/ Management
	Use of all car parks	Ongoing – with increased monitoring from 2017	Guest Services
Monitoring	Use of Sustainable Travel Discounts	Ongoing – with a more detailed system in place from April 2017	TPC/Marketing Team
	Annual travel survey (in person & electronic)	Annually each School Summer holidays – electronic new for 2017	TPC
	Travel Plan Monitoring Report	Within 2 months of survey	TPC

Student Travel			
Travel Mode	Measure	Timescale	Implemented By...
General Marketing	Travel information provided to new students	Ongoing	TPC/Education Team
	Travel info available in Education Centre	Ongoing	TPC
	Travel information on student intranet	Ongoing	TPC/Education Team
Walking/cycling	Covered/secure cycle parking	In place	TPC/Maintenance Team
	Showers and changing areas	In place	Maintenance Team
Bus/Train Travel	Student bus travel offers advertised	Ongoing	TPC/Education Team
Car & M/C	Car Share	Ongoing – informal system	
	Students not permitted to park on site	Ongoing	Management
Monitoring	Annual travel survey	Annually each Autumn	TPC/Education Team
	Travel Plan Monitoring Report	Within 2 months of survey	TPC

Corporate Visitor Travel			
Travel Mode	Measure	Timescale	Implemented By...
General Marketing	Travel information on website	Ongoing	TPC/Events Team
	Travel information provided to prospective event organisers	Ongoing	Events Team
	Provide links to sustainable travel websites to event organisers to pass on to guests	Ongoing	Events Team
Monitoring	Use of car parks by corporate events	Ongoing	Events Team/ Guest services
	Annual travel survey	annually each July/August	TPC
	Travel Plan Monitoring Report	Within 2 months of survey	TPC



Key:

Site Boundary Line



Project
**Bristol Zoo Gardens
Ladies Mile**

Drawing Title
**Location Plan
Existing**

Date	Scale	Drawn by	Check by
03/11/16	1:1250 @ A3	CW	TM
Project No	Drawing No	Revision	
26412	PL_01	-	

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