

## **Application no. 21/01999/F: Written Statement of Dr Dominic Hogg**

By way of background, until recently, I was Chairman of an environmental consultancy based in Bristol, Eunomia Research & Consulting. I set up the company in 2001. The company now employs 130 staff, mainly in Bristol, but also in London, Manchester, Brussels, Athens, New York, Sydney and Auckland. I have spent 25 years in consultancy, advising governments, local government and business on matters of policy and strategy related to environmental issues.

My concerns with the application made by Bristol, Clifton & West of England Zoological Society ('the Zoo') are many, but I will focus on the specific issue of whether the application does what is required to do in respect of climate change. The Council's Core Strategy, the drafting of which started back in 2006, and the associated policies, do not reflect the position of a Council that has declared a climate emergency (not to mention commitments made under the Paris Agreement, and the Government's stated objective to achieve net zero by 2050, as well as the interim 78% reduction in emissions relative to 1990 by 2035). Be that as it may, the Council published, in July 2020, a Climate Change and Sustainability Practice Note (CCSPN), which sought to give some greater force to its existing policies through setting out what applicants must do in their Energy and Sustainability Statements. All Statements have to follow the following principles (p.9):

*2. Sustainability Statements should engage with and address the energy requirements of policy BCS14, the water management requirements of policy BCS16 and each of the key issues listed in policy BCS15.*

*3. In respect of each of these issues, Sustainability Statements should set out what possible measures have been explored, which measures have been adopted and integrated into the design and, where relevant, why it was not feasible to incorporate certain measures into the proposed development.*

Regarding the second point, specifically regarding Renewable Energy Generation, the CCSPN states (p.17)

*The energy strategy should contain sufficient information to demonstrate that feasibility has been fully tested for a range of renewable energy technologies and that a 20% reduction in residual emissions has been achieved. A calculation of the likely energy generated from the renewable technology along with the resultant CO2 emissions reduction should be provided in the energy strategy*

The Applicant's Energy and Sustainability Statement states that air source heat pumps are viable. It states that photovoltaic panels (PV) and solar thermal energy are 'possible'. It does nothing thereafter to demonstrate the non-viability of PV or solar thermal.

The CCSPN is unequivocal about what should happen in the event that the Energy and Sustainability Statements fail to do what is required of them. One of these requirements (see the first extract above, bullet 3) is to demonstrate non-viability of renewable energy solutions which are not deployed. The CCSPN says '*A failure to convincingly address each of these issues will result in a refusal of planning permission*'. Since the applicant's proposal includes (for example) no solar PV, and no solar thermal, despite identifying both of them as being possible, and having made no attempt to indicate why they are non-viable, then the only conclusion that can be reached is that, following the clear wording of the CCSPN, the application must be refused. The CCSPN does not use language suggesting the application 'may be' refused, or 'can be' refused: the word used is, 'will'. That the planning officer's report avoids referencing this matter, and recommends approval rather than refusal, indicates a failure on the part of the officers to provide the information which Councillors on the Committee have every right to expect.

Other matters of serious concern relate to the application's absence of any space for play, or indeed, for would be residents to meet (other than the car park). It is virtually impossible to square the proposed application with the content of Section 12 of the NPPF. It is clear that the majority of local residents object to the application and they do so because of its impact on the character of the neighbourhood. Had they had any say in the design of the development, it would look very different indeed. The report to Committee suggests that the only trade off, in terms of space, is with space for car parking. This ignores the trade off against space given over to dwelling numbers, the density of which is inconsistent with the character of the area. Nowhere is the applicant obliged to meet a minimum dwelling density if in doing so, the character of the area would be compromised. Most local residents clearly feel that is the case.