

Bristol Zoo Application Comments Summary

22/02737/F

Appendix 1 - Contributor Comments

DC Committee date 26th April 2023

Notes:

- This document includes comments from contributors, including but not limited to statutory consultees, interest groups, and resident associations. For comments from neighbours and other members of the public, please see the document titled 'Neighbour Comments'.
- It has not been possible to include all figures, tables, or pictures included within the original comments within this document.

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Air Quality

Date: 15th July 2022

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

Arboriculture Team (BCC)

Date: 8th August 2022

Arboricultural Team

Date: 07th February 2023

Black text – response to initial scheme

Blue Text – response to revised scheme

Summary

I have reviewed the supporting documentation [for the revised scheme](#) which has answered most of my concerns. [I have no major objections but provide the following comments.](#)

[I am still have concerns regarding the juxtaposition between the shading from the proposed new dwellings of the lake houses, the museum and parrot house on important retained trees. The shade analysis demonstrates the rear gardens will not receive the minimum of 2 hours direct sunlight recommended by BRE during the winter months. This is outside of my field of expertise, and I can only recommend this is assessed prior to determination. To remedy my concerns, I propose a further tree preservation order is placed on the trees in and around the rear gardens prior to occupation following an amenity assessment.](#)

[I would request further detail or clarification on the location of street lighting columns and the proposed underground services and utilities \(as specified in the comments\). These can however be secured by condition.](#)

Bristol Zoo

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

We have worked at length with the design team during the pre-application process to ensure the most important trees on site are retained. This has been taken on board throughout the process and the final design has retained a vast majority of the important trees.

Supporting documentation

Supporting documentation that have been reviewed in relation to trees includes:

- Arboricultural report AIA & AMS
- [Tree protections phase 1-3](#)
- Design and access statement
- Landscape Design Statement
- [Combined proposed services and RPA Plan](#)
- Landscape Site Plan
- [Proposed tree schedule](#)
- Planting Plans 1 to 4
- Soft Landscape Key
- Management Plan
- [Price and Myers Drainage Plans](#)

Tree Survey

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

Tree Preservation order

Tree Preservation order 1438 was an initial amenity assessment of the landscape trees within the current context of the zoo gardens prior to any planning applications being made to ensure the highest quality landscape trees were a material consideration during the planning process.

Following the completion of the development a further amenity assessment should be undertaken to assess the changing public amenity of the remaining trees, the re-development of the site will allow public access during the day and the addition of new homes, pedestrian paths and the remodelling of the lake may increase the amenity value of trees. Additional pressures from the new dwellings on adjacent trees with a high amenity value should be further protected.

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

Influence of proposed development on TPO 1438 & tree register trees.

Tree no	Common name	Tree reg Status	TPO 1438	BS5837 Cat	Development influence
2	Austrian pine	-	Yes	A2	Retained
3	Copper beech	-	Yes	A2	Retained

5	Wedding cake tree	National	Yes	B2	Retained Soli Amelioration
15	Loquat	County	Yes	B2	Proposed removal
17	Zelcova	National	No	U	Removal poor health
25	Lobner's magnolia	National	Yes	B2	Retained
32	Monkey puzzle	-	Yes	A2	Retained
40	Cherry (<i>P.Pandora</i>)	County	No	C2	Retained
42	Silver lime	-	Yes	B2	Retained
44	Silver lime	-	Yes	B2	Retained
46	Turkey oak	-	Yes	B2	Retained
47	Noble beech	-	Yes	A2	Retained
48	English oak	-	Yes	B2	Retained Soli Amelioration
50	Sweetgum	Yes	A2	Retained	
52	Turkish hazel	Remarkable tree	Yes	A2	Retained
54	Box-leaved Azara	County	Yes	B2	Retained
58	Handkerchief tree	Remarkable tree	Yes	A2	Retained
66	Hornbeam	-	Yes	A2	Retained
69	Weeping copper beech	County	Yes	B2	Retained
72	Foxglove tree (<i>Fargesii</i>)	County	Yes	B2	Translocated
76	Dwarf variegated sycamore	County	Yes	B2	Retained
83	Eastern Hawthorn	National	Yes	A3	Soil Amelioration
87	Variegated sweetgum	County	Yes	B2	Translocated
95	Ginkgo (<i>Horizintalis</i>)	Remarkable tree	Yes	A2	Retained
100	Maidenhair tree	-	Yes	A2	Retained
108	Incense cedar	-	Yes	A2	Retained
116	Common lime	-	Yes	A2	Retained
149	Tubeflower (<i>Viburnum</i>)	National	No	C2	Retained

151	Walnut	-	Yes	B2	Retained
152	Black locust	-	Yes G1	B2	Retained
154	Pride of India	-	Yes G1	B2	Retained
158	Pride of India	-	Yes G1	B2	Retained
176	Blue Atlas cedar	-	Yes	A2	Retained
180	Taiwanese photinia	County	No	U	Removal poor health
182	Magnolia Delavayi	County	Yes	B2	Retained

Tree Register trees

The site is fortunate to have 19 registered trees, 5 National Champions, 11 County Champions and 4 remarkable trees. Although these are recognised trees of note many of them are in a declining condition or located in less-than-ideal landscape locations. Two county champions *Malus florentina* & *Metasequoia glyptostroboides* have been removed historically prior to any application being made.

The Tree Register trees enhance the character of the proposed development and maintain a link to the historic land use as a zoological garden. The loss of the *Malus florentina* & *Metasequoia glyptostroboides* prior to the application process and the further loss of trees T17 Zelcova serratta 'Village Green' & T180 Photinia serratifolia are a significant loss. Within the landscape plans 1 Zelcova serrata 'Village Green' & 3 Photinia serratifolia have been proposed to secure this species longevity within the development.

Translocation of trees

2 trees protected by TPO 1438 have been identified for translocation: T72 Paulownia fargesii & T87 Liquidambar styraciflua 'variegata'. This is a complex process of moving semi mature trees that does not guarantee successful establishment. Within the landscape plan 4 (South) Paulownia fargesii & 1 Liquidambar styraciflua 'variegata' have been proposed to secure this species longevity within the development.

44 trees have been identified for translocation these are made up of *Dickinsonia antarctica*, *Trachycarpus fortune* & *Cordyline australis*. The Soft Landscape – Key Plan has suggested 58 trees of a combination of these species will be planted and that 44 will be through translocating trees currently present on site; there locations have been presented on the 4 landscape planting plans. The translocation of these species is more feasible than broadleaf trees due to their root morphology, as such there is no objection in principle.

Shading & Fenestration

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

BRE Guidelines: Sunlight to gardens and amenity spaces

' The assessment measures the percentage of each area that can receive at least two hours of sunlight on 21 March - the two-hours sun-on-ground (SOG) test.

If, following development, the area of the garden or other amenity space that can receive two hours of direct sunlight on 21 March is reduced to both less than 50% of its total area and less than 0.8 times its

former value, the loss of sunlight is likely to be noticeable and the space will tend to look more heavily overshadowed’.

‘The Guide has very little with regard to trees and their potential effects on amenity areas but in the case of trees here as we are looking at full leaf and bare branch, we have assessed the effect of the trees on 21 June and 21 December to try to understand the mean’.

Trees and Hedges

‘Appendix G of the BRE guide considers the implications of trees and hedges, with paragraph G1.1 stating that “Most trees species will cast a partial shade, for deciduous trees this will vary with the time of year”. The shade caused by trees in the summer months is dappled and not as dense as that caused by a building or solid obstruction.

The BRE guide does not have an assessment for considering the implications of trees on neighbouring existing dwellings. Paragraph G1.2 explains that it is generally more difficult to calculate the effects of trees on daylight because of their irregular shapes and because some light will generally penetrate through the tree crown. Stating that “Where the effect of a new building on existing buildings nearby is being analysed, it is usual to ignore the effect of existing trees. This is because daylight is at its scarcest and most valuable in winter when most trees will not be in leaf”.

Lakeshore houses

The lake shore houses have been designed in a semicircle which hugs the southern bank of the lake. These dwellings consist of 3 & 4 storey town houses with large trees in close proximity to the rear gardens and the lake. The large trees are imposing features within a new residential setting that have the potential of causing a perceived risk of harm as well as the loss of light to gardens.

The Lake houses - Shade analysis findings

Attached drawing 22011-SHD-002 show the Sun-on-Ground results on both 21 June (summer solstice) and the

21 December (winter solstice). The results indicate that of the 13 gardens considered, 11 will comfortably receive 2 hours of direct sunlight on 21 June, with only garden areas A8, which receives 2 hours of direct sunlight to 48% of its area and A11 which receives at least 2 hours of direct sunlight to 38% of its area, falling below that

standard.

The overshadowing analysis in December indicates that none of the garden will receive at least 2 hours of direct sunlight. This is common as the sun is low in the sky and the gardens will be overshadowed by the buildings, with only marginal additional shadow caused by the trees.

The shade analysis shows none of the rear gardens will not receive at least 2 hours of direct sunlight during the winter months whilst the sun tracks close to its nadir; whether this is acceptable in planning terms is outside of my field of expertise but needs to be addressed prior to determination of the application. The BRE guidance does not consider that trees present a significant contribution to shading of dwellings.

Tress T66, T69, T72 & T176 are protected by TPO 1438. I would propose that the remaining trees located in the rear gardens are protected by a tree preservation order following a condition and amenity assessment to ensure the local planning authority are able to manage the level of works undertaken following occupation of the Lake houses. The increased access to the site would justify the elevated

amenity the trees would provide, I consider it is expedient to apply an additional tree preservation order due to the potential threat of over management due to the available light levels within the rear gardens.

The application of a tree preservation order prior to occupation would provide clear guidance to purchasers of the dwellings that the trees are features within the garden and can not be managed or removed without significant justification.

The Museum and Parrot house - Shade analysis findings

'Attached drawing 22011-SHD-005 show the Sun-on-Ground results on both 21 June (summer solstice) and the

21 December (winter solstice). The results indicate that of the 6 gardens considered, 5 will comfortably receive 2 hours of direct sunlight on 21 June, with garden A5 receiving 2 hours of direct sunlight to 49% of the area.

The overshadowing analysis in December indicates that none of the garden will receive at least 2 hours of direct sunlight. As mentioned above this due to the sun being low in the sky and the tree will only cause marginal additional shadow over the winter months.

The shade analysis again shows that the none of the rear gardens will not receive at least 2 hours of direct sunlight during the winter months. This needs to be addressed prior to determination.

A majority of landscape trees to the north of the gardens are already protected by TPO 1438; however I would consider further assessment of trees T38, T41, T43, T45, T63, T64 T138 & T139 prudent to establish whether further protection should be afforded to these trees prior to occupation.

Tree Loss

80 trees, 31 groups or part of and 3 hedges are proposed for removal to facilitate the proposed re-development. A detailed assessment in accordance with the planning obligations has been presented; 192 replacement trees are necessary to mitigate the loss. The landscape plan proposes 461 replacement trees with the translocation of a further 44 trees to maintain the mature character of the landscape. The landscape proposal fully mitigated the Planning Obligation requirements. The landscape plans should be revised to show the final locations for the 44 translocated trees.

I acknowledge that a large number of trees will be lost as a result of the proposal, but in general most of these trees are of average quality. Further, the retained trees are generally those of highest amenity value and quality.

Arboricultural Methodologies

Tree Protection

Tree protection during the development has been proposed in 3 phases: Pre-demolition and ground works, Construction and road network & Landscape and footpath network. Phasing tree protection throughout the development process is not ideal as this adds a level of complexity that needs to be managed and supervised by the project arboriculturist to ensure the phasing is implemented successfully; however, given the size of the site and high number of retained trees there does not appear to be a more simplified way of approaching the tree protection.

Arboricultural supervision will need to be conditioned to secure this process.

Ground Protection

Section 7 of the Arboricultural Method Statement provides details on the level of ground protection necessary depending on the weight of pedestrian or vehicular movement proposed. The report recommends a ground protection plan to present the access routes and weight of vehicles over root protection areas during the different phases of construction. This plan can be conditioned as a pre-commencement condition to secure the information.

Cellular Confinement

Cellular confinement systems have been recommended within footways and highway location within the root protection area of retained trees. These have been presented on tree protection plans, Phase 2 & 3.

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

Services and Underground Utilities

A Combined proposed services and RPA Plan has been provided that shows the location of all of the major services. 9 precautionary areas have been identified within the Root protection areas (RPA) of trees T6, T26, T27, T38, T56, T57, T138 & T139. None of the encroaching services are to an extent that could significantly affect the condition of the retained trees and working methodologies have been provided within the arboricultural method statement.

I have not been able to identify the locations of street lighting columns which have the potential to adversely affect the future management of retained trees and the landscape plan. 7 red dots with FH next to them are present which may represent the street lighting columns; if so the column adjacent to T138 is likely to cause a future conflict with the trees canopy depending on orientation.

The Landscape Strategy recommends extensive rainwater harvesting, Suds and water attenuation systems. All of which are below ground systems that have the potential to adversely affect the root protection areas of retained trees. The drainage plans (Price and Myers) generally suggest that drainage will avoid the RPAs of retained trees, but there are some locations where conflict with RPAs is possible, and hence a revised arboricultural method statement is needed and can be secured by condition. Further, the Landscape Statement indicates rainwater harvesting will be implemented but full detailed plans have not been provided. As a precaution, a revised arboricultural method statement should include details of any rainwater harvesting systems to support the landscape trees.

The plan shows the eastern lawn will host ground source heat pump loops. These have the potential to affect trees T125, T126, T127, T142 & T147. A revised arboricultural method statement should be required by condition to address this.

Landscaping

The Landscape Strategy is a detailed document that discusses the history of the landscape since the inception of the zoo gardens through to the present day. The design concepts of tree lined streets and deep planting beds with a mixed vertical planting structure will increase the species diversity and provide enhanced habitats for wildlife.

Any landscape proposal needs to form part of a well-balanced public realm scheme which is outside of my field of expertise and therefore I cannot comment on how the proposed landscape addresses any public realm comments.

I'm unsure whether street lighting has been identified within the services plan; in my experience street lighting is one of the major conflicts with new tree planting due to canopy sizes and street lighting requires relating to column heights and light throw from each column. A street lighting plan needs to be undertaken that compliments the landscape proposals.

The planting plans 1-4 and soft landscape key present a well-balanced tree planting scheme with a diversity of tree families, genus and species that assists in future proofing the site from the effects of climate change and genus specific tree pathogens.

Replacement planting for the lost Tree Register trees and translocated TPO trees have been included which maintains the species presence on site which is well received.

Policy compliance

National and local policy guidance relating to trees and green infrastructure

The abridged policy guidance below identifies the criteria that has been used to assess the scheme.

National Planning Policy Framework (2021)

The national Planning Policy Framework (2021) sets out the overarching objectives to secure net gains across each of the objectives through planning policies, guiding development towards sustainable development. The environmental objectives are to protect and enhance the natural environment and improve biodiversity.

Paragraphs

131. Trees make an important contribution to the character and quality of urban environments. Policy decisions should ensure new streets are tree-lined; unless there are compelling and justifiable reasons why it is inappropriate. Existing trees should be retained where possible and further opportunities are taken to incorporate trees in developments.

The landscape plans proposed tree lined streets and wide planting beds over the majority of the site. The Arboricultural Assessment has identified the most important trees and all but one (T15) have been retained.

174. Planning policies and decisions should contribute and enhance the natural environment; recognising the intrinsic benefits from natural capital and ecosystem services including trees and woodlands to minimising impacts on and proving net gains for biodiversity.

The landscape scheme has proposed 461 new trees which mitigates the trees losses in accordance with the Planning Obligation requirements. The proposed wide planting beds are an addition to ecosystem services.

180. If significant harm to biodiversity resulting from a development cannot be avoided, mitigated or compensated; planning permission should be refused.

Development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland and ancient or veteran trees should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

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

Core Strategy Policy BCS9

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

DM15: Green infrastructure provision

Green infrastructure provision facilitates a positive effect on people's health by providing space and opportunities for sport, play and social interaction; improves the quality of visual and natural environment; performs important functions such as mitigating flood risk, removing pollutants from the air and cooling rising urban temperatures. Green infrastructure also protects and enhances local nature conservation, creating and connecting habitats for wildlife.

Trees

The provision of additional and/or improved management of existing tree will be expected as part of the landscape treatment of new development.

The design, size, species and placement of trees provided as part of the landscape treatment will be expected to take practicable opportunities to:

- I ***I. Connect the development site to the strategic green infrastructure network, and/or Bristol Wildlife Network.***
- II ***II. Assist in reducing or mitigating run-off and flood risk on the development site.***
- III ***III. Assist in providing shade and shelter to address urban cooling.***
- IV ***IV. Create a strong framework of street trees to enclose or mitigate the visual impact of the development.***

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

DM17: Development Involving Existing Green Infrastructure

Trees are considered valuable multifunctional green infrastructure asses. The policy seeks to protect the most valuable trees and in line with the Core Strategy approach to green infrastructure assets, mitigate for the loss of other important trees by securing replacement tree on-site or in the public realm. The tree compensation standard provides a suitable mechanism to determine the appropriate level of mitigation where loss of trees is proposed as part of the development.

Trees

- **All new development should integrate important existing trees**
- **Development which would result in the loss of ancient woodland, aged trees or veteran trees will not be permitted.**
- **Where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided, in accordance with the tree compensation standard.**

The landscape plan fully mitigates tree loss in accordance with the planning obligations SPD. The most important trees on site, those on the Tree Register and those protected by TPO 1438 have been retained or translocated (Except T15). No ancient or veteran trees will be adversely affected by the proposed.

Conclusion

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

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

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

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

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

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

Additional Information Required

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

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

[The above however can be secured by condition.](#)

Conditions

Pre-commencement

Tree protection – Phase 1

Ground protection Plan – Site specification for appropriate ground protection depending on predicted weight of vehicles through the construction process.

Arboricultural method statement – to address as a minimum, below ground services and utilities.

During construction

Tree Protection – All phases.
Arboricultural Method Statement

Arboricultural supervision

Supervision during key stages of development (to be confirmed in advance of any final decision being made)

- • Tree protection phases 1-3
- • Demolition of structures within the RPA of retained trees
- • Ground protection – installation during phases 1-3.
- • Translocation of TPO trees, Trachycarpus, Dicksonia & Cordyline
- • Cellular confinement within RPA of retained trees
- • Soil level changes within the RPA of T2

Landscape planting

Compliance condition with 5-year replacement for failures.

Avenue Residents Association

Date: 29th June 2022

Comments: On Behalf of The Avenue Residents Association. BS8

A number of residents of The Avenue have asked the Residents Association to object to the plans as proposed.

There are numerous objections but they can be summarised as follows:

- 1) The density of the proposed development is far too high. It is clear that the Zoo's only interest is to maximise profit without any regard to the legacy it will leave.
- 2) The height of the buildings will significantly impact light on adjacent properties and will be an eyesore.
- 3) The design of the proposed is out of keeping with existing properties, looks awful and will age in a very short period of time.
- 4) The comments on parking are naive and frankly ridiculous. The Avenue will be clogged with residents and their visitors.
- 5) The traffic access onto Guthrie Road will cause severe congestion and will be a safety hazard especially during busy hours at the school. Even at the moment it can take 10 minutes to access Pembroke Road from The Avenue during school drop off. There have been several near misses with school children already. There has been no consideration of vulnerable road users.

Regards

The Avenue Residents Association.

Avon Fire and Rescue Service

Date: 22nd August 2022

Our reference: JG/FG/22/02737/F

Further to the planning application reference 22/02737/F Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA, Avon Fire & Rescue Service will have additional Hydrant requirements associated with this application, please see attached plan as to our hydrant requirements. The costs will need to be borne by developers through developer contributions. I have set out below the calculated costs per Hydrant. Avon Fire & Rescue Service aim is ensuring members of the community are safe from fire and feel safe within their own homes by taking a risk assessed approach. We work with partner agencies developing strategies to help reduce the risk of fire within the community, and also assisting our partners in achieving their targets. Our current strategy to reduce risk is simple: prevention, protection, response. Where efficiencies can be made we will work in partnerships to achieve these strategies. For example, we can bring positive

change through effective education, influencing safer design of products, buildings and many other fire prevention activities. In the event of a fire occurring we want to ensure that people are protected, remain safe and can escape unharmed. We can achieve this by enforcing fire safety regulations in buildings and undertaking home fire safety checks, including the fitting of smoke alarms. It is important that our communities know that if they need our help, we can respond to a range of emergencies, including fires and rescues. Central Government does not provide any funding to Avon Fire & Rescue Service for the capital cost of growth related infrastructure. Where possible Avon Fire & Rescue Service will need seek and explore opportunities in relation to funding from other sources to meet the changing demands within its operational area. Therefore, Avon Fire & Rescue Service may need to become reliant on local support funding through either developer contributions, Section 106 of the Town and Country Planning Act 1990, through the Community Infrastructure Levy (CIL). These developments will contribute to a significant increase in demand for Avon Fire & Rescue Service. As the population increases, so does the demand. This has an added impact upon the current resources therefore stretching our assets to meet this demand. It is accepted that Avon Fire & Rescue Service will not be increasing the number of resources or assets to manage with this growth. However Avon Fire & Rescue Service is seeking to formulate discussions to move fire stations to meet these new increasing demands. These plans will ensure Avon Fire & Rescue Service is able to ensure a fire engine will arrive at a Category '1' building fires within eight (8) minutes, as set by Avon Fire & Rescue Service Chief Fire Officer/Chief Executive Officer Simon Shilton and fully endorsed by the Fire Authority (Elected Councillors) Members. Fire Hydrants The additional residential and commercial developments will require additional hydrants to be installed and appropriately-sized water mains to be provided for fire-fighting purposes. This additional infrastructure is required as a direct result of the developments and so the costs will need to be borne by developer. Avon Fire & Rescue Service has calculated the cost of installation and five years maintenance of a Fire Hydrant to be £1,500 + vat per hydrant. Importantly, these fire-fighting water supplies must be installed at the same time as each phase of the developments is built so that they are immediately available should an incident occur and the Fire & Rescue Service be called.

Accompanying map:



Avon Gardens Trust 1 of 3

Date: 8th July 2022

Description: Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings. (Major) Application

Ref: 22/02737/F

The Avon Gardens Trust is a member organisation of the Gardens Trust and works in partnership with it in respect of the protection and conservation of historic parks and gardens, and is authorised by the GT to respond on GT's behalf in respect of such applications. The Trust refers to the above planning application. The site lies within Bristol City Council's Clifton and Hotwells Conservation Area and abuts the Downs Conservation Area to the north. Paragraph 7.1.2b of the Clifton & Hotwells Character Appraisal & Management Proposals (2010) describe the Zoo Gardens: 'The combination of formal Victorian Gothic architecture and mature planting are an essential focus of this part of the conservation area.' Bristol Zoo Gardens are also designated as a Local Historic Park/Garden and an Important Open Space. The Trust understands the Zoo's objective to raise funds in order to relocate the Zoo to The Wild Place. Nevertheless, the Trust is concerned that the proposals represent overdevelopment of the site. The proposed extent and scale of development, and the site layout, would result in the Gardens being enclosed by extensive and overbearing blocks of development up to 6 storeys high. The essential

character and quality of the Zoo Gardens would be lost, with resultant impact to the character of this part of the Clifton and Hotwells Conservation Area. The Arboricultural Report describes the many important trees within Bristol Zoo Gardens. The development would result in the loss of 80 trees and 31 groups or part groups of trees. The translocation of 17 trees, 11 part groups and 2 hedges is proposed as part of the proposals, but the Trust is concerned as to whether such translocations would be successful. Whilst the Arboricultural Report includes a drainage plan overlay showing root protection areas, there will be a need for other below ground services and the location of these may result in further trees needing to be removed, and difficulty in accommodating new planting. The proximity of some trees to proposed buildings, and the need for working areas and construction compounds, may also result in difficulties during the construction period leading to the loss of further trees. The character and quality of the Gardens would also be eroded by the intrusion of residents' cars, and the likelihood of extensive on street parking, given the low parking provision planned.

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

Yours sincerely, Kay Ross MA

Avon Gardens Trust 2 of 3

Date: 21st November 2022

Location: Bristol Zoo Gardens, Guthrie Road, Clifton, Bristol BS8 3HA

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

Application Ref: 22/02737/F

The Avon Gardens Trust is a member organisation of the Gardens Trust and works in partnership with it in respect of the protection and conservation of historic parks and gardens, and is authorised by the GT to respond on GT's behalf in respect of such applications.

The Trust refers to the above planning application and our letter of 7th July 2022 which provides our comments on the original submission. Thank you for inviting us to further comment on the revised drawings.

The revised proposals include a reduction of the number of residential units from 201 to 196, reduction in height of the extension to the clock tower building, changes to materials and elevational treatments of the proposed buildings, and changes to the design of the pedestrian accesses and pocket park on the north east corner of the site.

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

public, the massing of development and introduction of vehicles to the site would reduce the quality of visitor experience.

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

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

Yours sincerely,
Kay Ross MA
Chair, Avon Gardens Trust

Avon Gardens Trust 3 of 3

Date: 20th January 2023

The Avon Gardens Trust is a member organisation of the Gardens Trust and works in partnership with it in respect of the protection and conservation of historic parks and gardens, and is authorised by the GT to respond on GT's behalf in respect of such applications. The Trust refers to the above planning application and our letters of 7th July and 21st November 2022 which provide our comments on the original submission and revised drawings. Thank you for inviting us to comment on further revised drawings and other additional information submitted, which has been published on the Council website this month. The revised proposals include minor changes to Blocks E1 – E3 to deal with complaints about potential overlooking. These appear to comprise changes to the locations of windows and internal layouts, but no mention is made of any overall reduction in height of the Blocks. A revised landscape masterplan has been submitted but the only change we have noted relates to the landscape of the terrace to Block E3, which is increased in width by 1m to reduce overlooking from the garden to Pooles House. Additional pedestrian accesses are provided, shown on a Revised Site Access Strategy, at the north east corner of the site onto Northcote Road (which had already been submitted), and also now additional pedestrian accesses from College Road, Guthrie Road, and the southern end of Northcote Road. Perhaps you could advise if there are any further changes to the landscape masterplan, or the overall height and massing of the development, which we have not gleaned from the submitted drawings and information. The Trust remains concerned at the impact of the proposed development on this Local Historic Park/Garden and on the character of this part of the Clifton and Hotwells Conservation Area.

The Trust is still strongly of the opinion that the proposed extent and scale of development, and the site layout, would result in the Zoo Gardens being enclosed by extensive and overbearing blocks of

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

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

Yours sincerely, Kay Ross MA Chair, Avon Gardens Trust

Bristol Civic Society

Date: 12th July 2022

22/02737/F Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings.

Principle of redevelopment

The Zoo Gardens are designated as public open space in the development plan and on reflection the Society is not convinced by the current plans to partially develop the site for housing whilst retaining open space as publicly accessible gardens. We think that the proposal is neither fish nor fowl. It would be better either being kept as open space or redeveloped for housing. The Society questions who will wish to visit the site when it is surrounded and dominated by private housing. The special character of the existing Gardens will be further eroded with vehicles accessing an area where no vehicles have previously been permitted, both passing through the open space and parking there on a permanent basis. The verdant nature of the area will inevitably be completely transformed. In addition, there will be the challenge of maintaining such a significant area of open space, presumably paid for by service charges on future residents. There will be inevitable pressure to create a gated community at some point in the future. The Zoo Gardens currently provide an oasis of calm that has been enjoyed by Bristolians for generations. We consider that they are of such special environmental and historical importance that they should be retained as a fully accessible public asset.

Detailed response

Nevertheless, if the development in something like its current housing plus open space form is accepted, we have the following comments. In our response to the earlier consultation we welcomed the principles

published to guide the future of the Bristol Zoo site. The Society has considered whether the proposals match the aspiration of these principles. In particular, the aim to create an inspiring and sustainable development that celebrates the sites natural and built heritage. We will create space for communities to thrive and the wider public to enjoy a legacy to make us and Bristol proud. The retention of open space for future public access (even if used less than if it was completely open space), and the reuse of historic buildings, are positive proposals. The proposed Conservation Hub is welcome. However, in the Society's view the current proposals fall short of the stated aspirations in a number of ways. Aspects of the proposals also cut across adopted development plan policies, in particular DM17 in the Bristol Local Plan Site Allocations and Development Management Policies which states, Development on part, or all, of an Important Open Space as designated on the Policies Map will not be permitted unless the development is ancillary to the open space use. The Society has reservations over the heights of several of the proposed residential blocks and considers that further detailed assessment will be required. The Society also has reservations about the quality of the architecture, and notes that others have also expressed the view that this site deserves building design proposals which make a much more positive contribution to the appearance of the Conservation Area and to the setting of Listed Buildings. This particular issue remains a critical aspect when making an overall assessment of the case to change the main use of the site. The Society is disappointed by the lack of ambition with respect to the eco credentials of the project, particularly with such a high level of car provision in such an accessible location.

Height of buildings

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

Clifton Conservation Hub

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

Vehicle access, circulation, and parking

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

Retention of public access

As noted above, there is clearly a challenge in retaining public access to the open spaces when they will be bounded by private residential areas. The juxtaposition of private and public outside areas will need very careful design and planning to ensure satisfying experiences for all parties. There is lack of clarity about the future of the water body is it really to be utilised for wind surfing and boating or for more conservation related purposes? As the illustrations demonstrate, and notwithstanding the efforts made to avoid significant incursions into the gardens, the Society fears that much of the essential character of the gardens will be lost. This is because of the likely visual dominance of the apartment blocks and the resulting sense of overbearing the gardens. Currently the gardens offer oases of tranquillity and privacy from urban bustle, with a minimal sense of intrusion from the outside world. There is a very real risk these will be lost, in part because of the dominance of the proposed buildings but also because of the manner in which the service roads dissect the site and will bring vehicular movement deep into the gardens. It is absolutely fundamental that if the BZS truly want to deliver a legacy consistent with the principles it published, then it should commit to binding any future developer to the proposals

Bristol Neighbourhood Planning Network

Comments: NPN is not a consultee at planning application stage

Bristol Tree Forum 1 of 2

Date: 31 March 2023

22/02737/F | Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings. (Major)

“The trees at Bristol Zoo Gardens are some of the finest to be found in Bristol and are an exceptional collection that is nationally, and indeed internationally, important. There are dozens of individual trees in the Gardens that are noteworthy for their rarity, or as fine examples of their species. Several national 'Champion' trees have been recorded, and the collection as a whole is of immense value to the city for cultural, historic, and environmental reasons.” Paul Wood, author of London's Street Trees: A Field Guide to the Urban Forest.



Further comments

The following comments are in addition to our earlier comments dated June 2021, and are in response to the publication on 24 March 2023 of Natural England’s Biodiversity Metric 4.0. 1 This revised metric (BNG 4.0) revolutionises the way urban trees are valued, making it clearer than ever that they are a very important habitat. This new model is likely to be given statutory force when the biodiversity elements of the 2021 Environment Act² take effect later this year.

1. The pending application

Natural England advises that: 'Users of previous versions of the Biodiversity Metric should continue to use that metric (unless requested to do otherwise by their client or consenting body) for the duration of the project it is being used for. This is because users may find that certain biodiversity unit values generated in biodiversity metric 4.0 will differ from those generated by earlier versions.' Given that the approach to valuing urban trees has fundamentally changed, we ask Bristol City Council, as the ‘consenting body’, to require the applicant to adopt this new methodology, if only for Individual Urban trees habitats. Our reasons are set out below.

2. Biodiversity net gain analysis

In our original comments, we argued that the Urban tree habitat area calculation methodology used by the applicant in its BNG 3.0 calculation (now updated³) is flawed and unworkable. We advocated for the use of the calculation method given in BNG 3.1, if only for its Urban tree habitat area calculations. However, we now contend that BNG 4.0 – and the Individual trees habitat methodology it advises – should be used, because it has reverted back to the methodology in BNG 3.0, except that the table it uses (see Table 8-1 below) has resolved these earlier issues.

Here is the new Individual trees habitat area measurement methodology used in BNG 4.0.

8.3.8. Once the size, number and condition of trees is known, assessors should generate an area equivalent value using the ‘Tree helper’ within the metric tool ‘Main menu’ (Figure 8-2). The ‘area equivalent’ is used to represent the area of Individual trees. This value is a representation of canopy biomass, and is based on the root protection area formula, derived from BS 5837:2012.

Tree helper						
Tree size	Number of trees and area (ha) for each condition state					
	Poor	Area	Moderate	Area	Good	Area
Small		0.0000		0.0000		0.0000
Medium		0.0000		0.0000		0.0000
Large		0.0000		0.0000		0.0000
Total	0	0.0000	0	0.0000	0	0.0000

Figure 8-2 The tree helper embedded within the metric tool

8.3.9. Table 8-1 sets out class sizes of trees and their area equivalent. For multi-stemmed trees the DBH of the largest stem in the cluster should be used to determine size class.

Table 8-1 Tree size classes and area equivalents

Size class	Diameter at breast height (cm)	Metric RPA radius (m)	Metric area equivalent (ha)
Small	greater than 7cm and less than or equal to 30cm	3.6	0.0041
Medium	greater than 30cm and less than or equal to 90cm	10.8	0.0366
Large	greater than 90cm	15.6	0.0764

Note: The correct metric equivalent area of Large category trees is 0.0765, not 0.0764.

This same approach applies to Individual trees habitats in groups or blocks:

8.3.12. Assessors should account for the size class (Table 8-1) of each Individual trees within a group or block. The number of Individual trees present within a group or block should be entered into the tree helper to calculate area equivalent. Do not reduce any area generated by the tree helper even if tree canopies overlap.

Adopting this methodology, we have amended our biodiversity net gain calculation as follows.

The applicant's biodiversity net gain report dated May 20225 is based on an assessment commenced in July 2021 and uses Biodiversity Metric 3.0 (BNG 3.0), the latest iteration of which (version 6) was published on 28 February 2023. Save for the comments made below, we have adopted the applicant's baseline and created habitat data, although we have recast it using BNG 4.0 Metric, because of its new rules for dealing with the irreplaceable veteran tree habitat.

3. Strategic significance

We disagree with the applicant's use of Low strategic significance for all the habitat types. We have adopted a strategic significance of Medium for all the habitat types. Whilst the site is not formally identified in the Local Plan, it is nonetheless of significant ecological importance, both of itself and because is in a conservation area, is adjacent to the Clifton and Durdham Downs SNCI, is part of the wildlife corridor that connects the Downs with Avon Gorge; and it is within the IRZs of an SSSI and an SAC and within some 400 metres of Clifton Down Wood, an ancient woodland.

4. The urban tree habitat calculation

The applicant relies on BNG 3.0. Our earlier comments set out why we say that, so far as Urban tree Habitat (now called Individual trees – Urban tree habitat) is concerned, the use of the BNG 3.0 methodology is infeasible because it is both error strewn and flawed.

Having set the RPA radius (r) multiplier to DBH x 15 for the veteran tree7 T083, we have adopted the new BNG 4.0 methodology and, using the applicant's AIA tree survey data, we calculate that the baseline habitat area of the Individual trees – Urban tree on site is 6.0086 hectares, of which 2.0901 hectares will be removed and 3.9185 hectares retained. We have assumed that the DBH of each of the trees in a group is as reported for that group in the AIA. This represents a loss of 42.5% of the trees and 34.8% of their habitat from the site.

We have adopted (though we do not agree) the applicant's Moderate/Poor - 87.7% / 12.3% - condition proportions and calculate that these Individual trees – Urban tree habitats combined generate 49.62 baseline Habitat units (HUs), which is nearly 88.5% of the 56.09 on-site baseline biodiversity HUs.

5. Post-development Individual trees habitat area forecasting

The BNG 4.0 User Guide advises that any new tree planted will grow into a Small category tree at the end of the 'project timeframe'. This is likely to be 30 years by default, as per Part 1 s.9 of Schedule 14 of the 2021 Environment Act. This is the approach advised in the Guide:

8.3.13. Size classes for newly planted trees should be classified by a projected size

relevant to the project timeframe.

- most newly planted street trees should be categorised as 'small'.
- evidence is required to justify the input of larger size classes.

8.3.14. When estimating the size of planted trees, consideration should be given to growth rate, which is determined by a wide range of factors, including tree vigour, geography, soil conditions, sunlight, precipitation levels and temperature.

8.3.15. Do not record natural size increases of pre-existing baseline trees within postdevelopment calculations.

If a larger Individual trees habitat area projection is proposed, this will need to be justified.

The evidence of tree growth rates is patchy at best - see the About section in our Tree Canopy Prediction tool. To overcome this, we have adopted the simple rule-of-thumb approach commonly used by arboriculturists and assume that a tree's girth grows by one inch (2.54 cm) a year. We then apply this to the standard tree sizes adopted in BS 3961-1 -Nursery Stock Specification to Trees and Shrubs to calculate the eventual size of a tree 30 years after it has been planted. In all cases, save for semi-mature trees, the tree will be a BNG 4.0 Small category tree.

Here is the model we use:

British Standard BS 3936-1, Nursery Stock Specification for Trees and Shrubs					
Specification	Tree Girth	Lower (cm)	Upper (cm)	Median DBH (cm)	Estimated Age (yrs)
Light Standard (LS)	6-8cm	6	8	2.23	6
Standard (S)	8-10cm	8	10	2.86	7
Select Standard (SS)	10-12cm	10	12	3.50	8
Heavy Standard (HS)	12-14cm	12	14	4.14	9
Extra Heavy Standard (EHS)	14-16cm	14	16	4.77	10
Advanced Heavy Standard (AHS)	16-18cm	16	18	5.41	11
Semi mature	18 cm +	18	25	6.84	12

1" Annual Tree Growth (cm)	Girth (cm)	DBH (cm)	Project Timeframe (yrs)	DBH by Timeframe					
	2.54	0.8085	30	24.26					
Urban Tree Habitat size 30 years after planting									
Tree Size (BS 3961-1)	Planting DBH (cm)	Eventual DBH (cm)	RPA r (m)	RPA (sq m)	RPA (ha)	BNG 3.1 Size	BNG 4.0 Habitat (ha)	Difference (ha)	
Light Standard	2.23	26.5	3.2	31.7	0.0032	Small	0.0041	0.0009	
Standard	2.86	27.1	3.3	33.3	0.0033	Small	0.0041	0.0008	
Select Standard	3.5	27.8	3.3	34.8	0.0035	Small	0.0041	0.0006	
Heavy Standard	4.14	28.4	3.4	36.5	0.0036	Small	0.0041	0.0005	
Extra Heavy Standard	4.77	29.0	3.5	38.1	0.0038	Small	0.0041	0.0003	
Advanced Heavy Standard	5.41	29.7	3.6	39.8	0.0040	Small	0.0041	0.0001	
Semi-mature	6.84	31.1	3.7	43.7	0.0044	Medium	0.0366	0.0322	

The age of the tree being planted should not be 'credited' when calculating the time-to-target period. BNG 4.0 does not take account of annual mortality rates, which are high for urban trees. The applicant proposes planting 451 trees¹⁰ (though their BNG 3.0 calculation reports 314 and their AIA reports 461) on site. We have assumed that these trees will be new Standard as per the tables above and that these will achieve a moderate condition after 30 years. We have allocated 0.0041 hectares per tree to be created, as required by BNG 4.0 (see para. 8.3.13 of the BNG 4.0 User Guide). 451 such trees will generate some 1.84 hectares of new Individual trees – Urban tree habitat and 6.18 HUs after 30 years.

Individual trees – Urban tree habitat created in private gardens must not be credited as part of the post-development BNG calculation:

8.3.7. Where private gardens are created, any tree planting within the created garden should not be included within post-development sheets of the metric. The habitat type 'Urban – Vegetated garden' should be used. However, even planting all the 451 trees proposed in publicly accessible locations will not replace the urban tree habitat lost and achieve the 10% net gain which we understand the applicant aspires to. We calculate that a further 923 BNG 3.0 trees (classified as Small category trees in BNG 3.1 & 4.0) would have to be planted to achieve a Moderate condition and provide the 3.76 hectares of new Individual trees – Urban tree habitat needed to generate the minimum 10% biodiversity net gain that will also be required when the Environment Act 2021 takes effect in late 2023.

Without these extra trees, the applicant's proposals will result in a net loss of biodiversity of 12.52%, not the net gain of 36.00% that they have calculated. We accept that a 376.35% net gain of Hedgerow units will be achieved by this proposal.

Here are the headline results for our calculation (a copy of our BNG 4.0 calculation, together the underlying baseline Individual trees – Urban tree habitat area calculation, has been provided):

Bristol Zoo Gardens		Return to results menu	
Headline Results			
Scroll down for final results ↴			
On-site baseline	Habitat units	56.09	
	Hedgerow units	0.57	
	Watercourse units	0.00	
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	49.07	
	Hedgerow units	2.72	
	Watercourse units	0.00	
On-site net change <small>(units & percentage)</small>	Habitat units	-7.02	-12.52%
	Hedgerow units	2.15	376.35%
	Watercourse units	0.00	0.00%
On-site net gain is less than target set ⚠			
Off-site baseline	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	12.64	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change <small>(units & percentage)</small>	Habitat units	12.64	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	5.62	
	Hedgerow units	2.15	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
FINAL RESULTS			
Total net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	5.62	
	Hedgerow units	2.15	
	Watercourse units	0.00	
Total net % change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	10.01%	
	Hedgerow units	376.35%	
	Watercourse units	0.00%	
Trading rules satisfied?	Yes ✓		

Bristol Tree Forum 2 of 2

Date: 29 Jun 2022

Bristol Zoo Gardens – introducing the site

Bristol Zoo Gardens was opened in 1836 and has been in continuous use ever since. It is the fifth-oldest zoo in the world and has an international reputation, not only for its animal collection but also for its tree and plant collections. This is what the zoo has said about the gardens:

The plant collections at Bristol Zoo Gardens (BZG) are surprisingly complex and serve a wide variety of functions. ... The plant collection(s) fulfil several functions in that they provide an attractive and immersive environment for zoo visitors, a setting for animals, and are used to put into practice mission-friendly environmental, conservation and education activities. The gardens are also a major attraction in their own right.

The gardens have a high reputation and through them we seek to engage with the local community and wider horticultural and botanical communities. We aim to contribute and comply with various national and international strategies, policies and guidelines to carry out its mission.

- BZG maintains a nationally recognised collection of plants including "Champion Trees" that are recorded on the National Tree Register. We maintain and manage National Conservation Collection of Plants and Gardens/Royal Horticultural Society plant collections e.g., Caryopteris and Hedychium.

- Our plant collections are used to help realise appropriate national initiatives such as the UK Plant Diversity Challenge and ISO14001 environmental standard. We also contribute to the work of the UK Plant Network and the Plant Working Group of the British and Irish Association of Zoos and Aquariums.

See also our request for the trees on the site to be protected with a Tree Preservation Order (TPO) at Appendix 1.

The Zoo Gardens are within the Clifton Conservation Area and immediately adjacent to the Clifton and Durdham Down SNCI (a Site of Nature Conservation Interest), which is also an Important Open Space (DM17), a Town and Village Green (TVG) and a Valuable Urban Landscape (DM17).

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

Our conclusions briefly stated

The future of the Bristol Zoo Gardens (BZG) site is in the hands of the Bristol, Clifton & West of England Zoological Society Ltd and its designs for redeveloping the site will be seen as its legacy. The Society's website lists five objectives within its strategic plan:

1. Saving wildlife
2. Engaging our public
3. Creating conservationists
4. Sustaining our environment
5. Sustaining our future.

To be credible, we believe that these objectives must inform all aspects of the work of the Zoological Society, including the qualities aspired to in this planning application.

This application, however, falls short in a number of areas (see pages 3-11 below for more detail):

1. The BZG is part of Bristol's heritage assets, its historical environment. The application needs to be considered in light of the National Planning Policy Framework (NPPF), paragraphs 189-202. This balances harm against public good. BCS22 and DM31 reinforce this and make it clear that 'proposals affecting locally important heritage assets should ensure they are conserved having regard to their significance and the degree of any harm or loss of significance.' These proposals will result in harm and the loss of the significance of this unique historic garden asset.
2. The BZG is within the impact risk zone of the adjacent SSSI and SAC and the Avon Gorge Ancient Woodlands. It is also immediately adjacent to the Durdham and Clifton Downs SNCI. This has not been addressed even though.
3. Of the 381 on-site trees, 162 will be removed. This is 42.5% of the trees growing in BZG, an unacceptable loss that is unlikely ever to be replaced in any meaningful way, not even under the Bristol Tree Replacement Standard (BTRS).
4. The plan to translocate 55 trees gives no details of the proposed translocation sites or mitigation proposals in the case of failure. Translocation is fraught with risk. This has not been addressed.

5. An unworkable version of the metric for Biodiversity Net Gain (BNG) has been used (BNG 3.0) for calculating Urban tree habitat. BNG 3.1 fixes this and should be used instead. This shows that the trees growing on the site account for over 70% of its biodiversity.
6. The calculation of baseline and newly created Urban tree habitat is given without explanation.
7. There is an assumption that only half the urban trees planted will reach full maturity. No explanation is given for this.
8. The wrong Strategic Importance parameter has been used. The location and importance of the site means it has medium strategic importance, not the low importance that the applicant has given it.
9. The BNG calculation fails to account for the likely delay in creating new habitat. In our calculation we have allowed for a three-year gap between the development starting and the new habitats being created.
10. The applicant's proposals will result in a net 22% loss of biodiversity rather than the 38.6% gain they have stated.
11. BNG submissions should include an inclusive management plan with a guarantee covering a period of thirty years including a financial budget and ecological monitoring. This has not been produced. For all these reasons, the applicant has failed to comply with the minimum requirements of the planning authority.

The planning context

See Appendix 2.

The application and the ways it falls short

Historical environment The Zoo Gardens form part of one of the key elements of Bristol's Historical Environment and, as such, falls to be considered under paragraphs 189 – 202 of the NPPF, BCS22 and DM31 (see Appendix 2). Whilst the zoo's animals can be relocated, the trees and gardens cannot.

They are as much a part of the zoo as its animals are.

The NPPF makes it clear that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.'

If there is substantial harm (or total loss of significance of the heritage asset), then paragraph 201 requires that 'local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss'. Alternatively, the application must demonstrate that all the criteria set out in paragraph 201 are satisfied. Even if it were shown that there would be less than substantial harm, that harm must still be weighed against the public benefits of the proposal.

The Bristol Core Strategy 22 (BCS22: Conservation and the Historic Environment) reflects this and aims to ensure that 'all new development safeguards or enhances the historic environment,' and that 'Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance, including gardens and Conservation areas.'

DM31 recognises that Heritage assets, which can range from whole landscapes to individual items of street furniture, are a finite non-renewable resource that can often be irreparably damaged by insensitive development. In particular, it requires that 'proposals affecting locally important heritage assets should

ensure they are conserved having regard to their significance and the degree of any harm or loss of significance.’

Development in conservation areas will be expected ‘to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.’ BZG is an essential element of the ‘special character’ of the Clifton Conservation Area.

The loss of the integrity of this historic garden asset, both by its fragmentation and as a result of the likely change of the ethos by which it is managed - from a botanical garden serving a serious scientific purpose to pleasure gardens ancillary to and managed for the particular benefit of those who live there – will result in ‘harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting.’

We also understand that barely 25% of the gardens will be made accessible to the public, as opposed to the 100% they can now enjoy, albeit by paying an entry charge. Cars will also be able to access the site for the first time ever. Not only will this destroy the current amenity of the site, but it will also introduce a new source of pollution into the gardens that never existed before (save for service vehicles) and will damage the unique habitat and ecology of the site.

Paragraph 185 also requires that ‘Planning policies and decisions should also ensure that new development is appropriate for its location ... as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.’

Tree survey and BTRS analysis

The applicant states that ‘80 trees, 31 groups/part groups and 3 hedges are proposed for removal as a result of this development.’ Our analysis of the applicant’s Arboricultural Report - Impact assessment and method statement⁴ (AIA) records 393 trees – 218 individual trees and 175 in 45 groups. All bar 12 (T207 – T218) are on site.

It is proposed to retain all 24 retention category A trees as well as all of the 18 champion trees growing on the site, save for T015 (retention category B2), T017 (retention category U) and T180 (retention category U), which will be removed.

A further 55 trees will be transplanted⁵, though the new locations are not given. Tree transplantation is fraught with risk and has a significant failure rate. Many of the trees identified are mature or semi-mature, in fair condition and with at least 10 years of safe useful life expectancy. These risks should be factored into any mitigation or compensation proposals.

Of the 381 on-site trees, 162 will be removed (42.5%). These comprise 36 retention category⁶ B trees, 138 retention category C trees and 7 retention category U Trees.

We calculate that, under the BTRS, 266 replacement trees would need to be planted to replace what will be lost (see Appendix 3). We have assumed that all the trees in a group have the same stem diameter (DBH) as is reported for that group in the AIA. We are uncertain how the applicant has calculated its BTRS figure.

In any event, the applicant plans to plant some 451 (the AIA says 461) trees on site, so no offsite planning will be required, whichever figure is accepted. A schedule of the proposed trees to be planted on site has been produced in 22_02737_F-SOFT_LANDSCAPE_KEY_PLAN3236144.pdf.

Biodiversity net gain analysis

The applicant has produced a biodiversity net gain report dated May 2022.⁷ It is based on assessment commenced in July 2021 and uses Biodiversity Metric 3.0 (BNG 3.0), though the calculation has not been produced. We have asked for it as certain key parameters upon which the report is based have not been reported – in particular, how the baseline and created areas of the Urban tree habitats have been calculated, how much habitat has been retained (there are no proposals to enhance existing habitats) and which Strategic Significance setting they have used. In the meantime, we have attempted to recreate it based on the Biodiversity Net Gain Report produced.

Nonetheless, we are prepared to accept the applicant's calculation subject to the following caveats:

1. The appropriate BNG metric

Whilst the applicant relies on BNG 3.0, this has now been superseded by BNG 3.1. Nonetheless, save for the provisions relating to the treatment of Urban tree habitats discussed below, we accept their other BNG 3.0 calculations. We set out below our reasons for using BNG 3.1 in relation to Urban tree habitats – the corrected habitat size calculation and the new treatment of Urban trees under the Trading Rules.

2. Strategic significance

The applicant appears to have used a Strategic Significance of Low strategic significance for all habitat types. We disagree, and we have adopted a Strategic Significance of Medium strategic significance for all habitat types. Whilst the site is not formally identified in the Local Plan, it is nonetheless of significant ecological importance, both of itself and because it is in a Conservation area, is immediately adjacent to the Clifton and Durdham Downs SNCI, is part of the wildlife corridor that connects the Downs with Avon Gorge and is within the IRZs of an SSSI and a SAC and within some 400 metres of Clifton Down Wood, an ancient woodland.

3. Urban tree habitat calculation

The applicant's baseline calculation shows two Urban tree habitats – a Moderate condition area of 0.64 hectares and a Poor condition area of 0.09 hectares. No explanation is given as to how these two areas have been calculated.

The applicant relies on BNG 3.0, but the basis upon which the areas of Urban tree habitats are calculated in BNG 3.0 is flawed because the table produced at 7-2 of the BNG 3.0 User Guide is unusable. This is because it is impossible (save where a DBH exactly matches one of the three size categories given – 10cm, 30cm & 50cm) to allocate any given tree's DBH to any of the three size categories – Small, Medium, Large – that are listed (see Figure 1 below).

7.12 The area calculation for Urban trees is worked out using a Root Protection Area (RPA)⁴⁹ formula. The Urban tree helper uses the RPA to generate an area equivalent value. (See Table 7-2.)

TABLE 7-2: Urban tree size by girth and their area equivalent

Size	Diameter at Breast Height (cm)	Stem Diameter (cm)	RPA (radius in metres)	Area equivalent (ha)	No. of Trees equivalent to 1 ha
Small	30cm	10cm	1.2m	0.0005 ha	2,000 trees
Medium	90cm	30cm	3.6m	0.0041 ha	244 trees
Large	150cm	50cm	6 m	0.113	89 trees

Figure 1 BNG 3.0 Table 7-2

This has been rectified with the recent publication of BNG 3.1 which now gives this useable guidance for Urban tree habitat calculation (Figure 2 below):

Calculating area

Baseline

7.9. The area calculation for Urban trees is worked out using the Root Protection Area (RPA) (British Standards Institution, 2012)⁴⁴ formula $\text{area} = \pi \times r^2$ where r is twelve times the tree's Diameter at Breast Height (DBH) for a single stemmed tree. For multi-stemmed trees the DBH of the largest stem in the cluster should be used to determine radius (r).

- Where detailed measurements are available to the assessor, through an Arboricultural Impact Assessment (AIA) or similar, these measurements should be used to determine the area measurement for use with the biodiversity metric.
- The area of all trees within the project boundary should be accounted for, regardless whether a tree would require root protective measures or not.

⁴⁴ For more information see: THE BRITISH STANDARDS INSTITUTION (BSI) (2012) *Trees in relation to design, demolition and construction – recommendations* [online]. Available from: [British Standard 5837 2012 Trees in relation to design, demolition and construction](#)

Therefore, DBH values within AIA reports should be used to calculate area values for use with the metric (rather than RPA's prescribed by the AIA).

7.10. In the absence of detailed measurements, the 'Urban tree helper' may be used to generate an area equivalent RPA value (for example, at project scoping prior to detailed survey). The urban tree helper is found within the 'Main menu' of the metric tool. Table 7-2 sets out class sizes of Urban tree sizes, and area equivalent (for input into the metric tool).

Figure 2 The approach to use when calculating Urban tree habitat (see Figure 2 below for Table 7-2)

Save that we have set the RPA radius (r) multiplier to $\text{DBH} \times 15$ for the veteran tree¹⁰, T083, we have adopted this approach and, using the applicant's AIA, calculate that the baseline habitat area of the trees on site is 1.99 hectares, of which 1.64 hectares will be removed and 0.3456 hectares retained. We have assumed that the DBH of each of the trees in a group is as reported for that group in the AIA.

We have, for convenience (though we do not accept that this almost unique collection of trees justifies such low scores), adopted the Moderate/Poor - 87.7% / 12.3% - condition proportions adopted by the applicant and calculate that, taken together, these Urban tree habitats generate 16.44 habitat units, which is 72% of all the biodiversity found on site.

4. Urban tree habitat creation

The applicant proposes the following for Urban tree habitat creation:

Urban – Urban Trees

- 3.20 Circa 314 urban trees are to be planted as part of the proposals, of which it has been assumed half will reach full maturity. It is assumed that **Moderate condition** can be achieved as many of the species to be planted should reach maturity in 27 years (pass criteria 3) and that a continuous canopy can be formed (pass criteria 2). It has also been assumed that 80% of trees have reached medium size by 27 years (the other 20% being small).

Figure 3 Proposed Urban tree habitat creation

Save that the applicant's soft landscaping plan¹² identifies 451 trees to be planted on site, why is it suggested that only half will reach full maturity? Will the other half not survive? Also, the drawings produced do not suggest that most of the trees to be planted will achieve 'a continuous canopy'. Furthermore, we do not understand how the applicant has calculated that 0.53 hectares of new habitat will be created. We have adopted a different methodology for new habitat creation, using BNG 3.1, as set out in Figure 4 below:

TABLE 7-2: Urban tree size classes and their area equivalent

Size class	Diameter at breast height (cm)	Metric RPA radius (m)	Metric area equivalent (ha)
Small	≤ 30cm	3.6m	0.0041 ha
Medium	> 30 to ≤ 90cm	10.8m	0.0366 ha
Large	> 90cm	15.6m	0.0764 ha

Post-development

- 7.11. When calculating the area for newly planted Urban trees Table 7-2 should be used. Size classes for newly planted trees should be classified by projected size at 30 years from planting.
- 7.12. When determining post-development changes to rural hedgerows and lines of trees recorded in the baseline (see Chapter 8) these should not be entered post-development as linear blocks of Urban trees. This is to satisfy trading rules.

Figure 4 The methodology for creating new Urban tree habitat

We have adopted the approach set out in paragraph 7.11 and, using the new version of Table 7-2, have calculated that a Standard stock tree¹³ planted today will have grown into a BNG 3.1 Small category (BNG 3.0 Medium category) tree at the end of 30 years.¹⁴

The BNG 3.1 Trading Rules also state:

Trading Rules

7.8. The mitigation hierarchy and trading rules apply to Urban trees. Given Urban trees are a 'Medium' distinctiveness habitat trading rules stipulate that the same broad habitat type (or a higher distinctiveness habitat) is required. However, given the important ecosystem services value provided by trees, where possible 'like for like' compensation is the preferred approach (i.e. where possible any loss of Urban trees should be replaced by Urban trees - rather than other urban habitats).

Figure 5 BNG 3.1 Trading Rules

The applicant proposes planting 451 Urban trees¹⁵ (though Figure 3 reports 314 and the AIA reports 461) on site. No tree planting schedule has been produced, but we have assumed that these will be new Standard trees, which will achieve a moderate condition after 30 years. We have allocated 0.0041 hectares per tree to be created, as required by BNG 3.1 (Figure 3 above). 451 such trees will generate 1.84 hectares of urban tree habitat after 30 years.

We have also factored in an extra three years to allow for the delay in planting these trees whilst the site is developed. This reduces the final time to target multiplier for the creation of this new Urban tree habitat from 0.382 to 0.343.

However, even planting 451 trees will not replace the Urban tree habitat lost plus 10% net gain, which the Trading Rules advise should be replaced like-for-like (Figure 4 above). We calculate, having factored in a three-year delay between the habitat being removed and eventually replaced, that a total of 1,055 BNG 3.0 Medium category trees would have to be planted to achieve a moderate condition and provide the 4.29 hectares of new Urban tree habitat needed to generate the minimum 10% biodiversity net gain that will be required when the Environment Act 2021 takes effect in late 2023 and which, we believe, the applicant aspires to.

Without these extra trees, the applicant's proposals will result in a net loss of biodiversity of 22.24%, not the net gain of 38.66% that they have calculated.

Figure 6 below shows the headline results for our calculation (a copy is available on request):

Bristol Zoo Gardens		Return to results menu	
Headline Results			
On-site baseline	Habitat units	22.90	
	Hedgerow units	0.57	
	River units	0.00	
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	17.81	
	Hedgerow units	2.69	
	River units	0.00	
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	-22.24%	
	Hedgerow units	369.91%	
	River units	0.00%	
Off-site baseline	Habitat units	0.00	
	Hedgerow units	0.00	
	River units	0.00	
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	0.00	
	Hedgerow units	0.00	
	River units	0.00	
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	-5.09	
	Hedgerow units	2.12	
	River units	0.00	
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	-22.24%	
	Hedgerow units	369.91%	
	River units	0.00%	
Trading rules Satisfied?	No - Check Trading Summary		

Figure 6 BNG Metric 3.0 calculation headline results

5. Bristol LPA guidance on BNG

The latest guidance we have seen from Bristol LPA on the requirements for biodiversity net gain is as follows:

“Ecological mitigation is required to meet the requirements of the National Planning Policy Framework (NPPF). The National Planning Policy Framework (2019) states in paragraph 170(d) on page 49 that planning decisions should minimise impacts on and provide net gains for biodiversity. It is recommended that the proposal employs Defra / Natural England’s Biodiversity Net Gain (BNG) biodiversity metric 2.0 (as updated) to develop ecological mitigation proposals. The BNG assessment should be undertaken prior to the validation of a future planning application and not conditioned. Planning applications submitted to Bristol City Council should demonstrate a positive biodiversity gain when using this metric. Please note that this may require off-site mitigation to achieve a Biodiversity Net Gain. Applicants should provide full details of their data, measurements and workings used to calculate the percentage BNG. Engagement with the Council’s pre-application process to inform BNG proposals and the design of ecological mitigation proposals at an early stage is encouraged. The Defra Biodiversity Net Gain (BNG) Biodiversity Metric 2.0 includes an off-site module which is fully integrated within the methodology. If a positive on-site BNG score cannot be achieved, the off-site module should be used as the automatic next step to achieve a positive BNG score. A financial contribution is not an acceptable way forward because it does not calculate biodiversity units and so will be an arbitrary figure that will be very difficult to calculate or justify. All BNG submissions should be accompanied by a nature conservation and landscape management plan which addresses features of interest, objectives, management compartments and prescriptions, a

work schedule including a thirty year annual work plan, resourcing including a financial budget and ecological monitoring. This should cover a 30 year period. Please note that if the Environment Bill is passed, a future planning application will be required to demonstrate a mandatory minimum 10% Biodiversity Net Gain as measured using the Defra Biodiversity Metric 2.0 (as amended).”

Save that the relevant paragraph in the NPPF (2021) is now 174 d)17 , that the current biodiversity net gain metric is BNG 3.1 and that the Environment Act 2021 is now law, and the mandatory minimum 10% Biodiversity Net Gain will take effect next year, this guidance still applies.

On our analysis, the applicant has failed to ‘provide net gains for biodiversity’ or to ‘demonstrate a positive biodiversity gain when using this metric.’

The applicant also proposes that ‘management prescriptions to establish habitats at (or above) their required condition is detailed within a Landscape and Ecological Management Plan (LEMP), secured by an appropriately worded planning condition.’ However, the guidance above states that ‘all BNG submissions should be accompanied by a nature conservation and landscape management plan which addresses features of interest, objectives, management compartments and prescriptions, a work schedule including a thirty year annual work plan, resourcing including a financial budget and ecological monitoring. This should cover a 30 year period.’ This cannot be ‘secured by an appropriately worded planning condition’ to be prepared at a later date nor be limited to just 27 years.

For all the reasons set out above, the applicant has failed to comply with the minimum requirements of the planning authority and its application must therefore be refused.

Appendices included within these comments are available to view on the website, and includes a written request to TPO trees at Bristol Zoo Gardens from Bristol Tree forum (June 2021), a discussion of the relevant planning context, and Bristol Tree Replacement Standard Calculations.

Bristol Waste Company 1 of 2

Address: Bristol Waste Company Limited, Albert Road, Bristol BS2 0XA

Comments

Dear Case Officer,

I have sent a separate email to you regarding this major development as it contains tables difficult to replicate on a text response.

Regards

Peter Hall, Bristol Waste Company

Bristol Waste Company 2 of 2

Dear Case Officer, Following a review of the documentation, Bristol Waste has considered the waste and recycling provision for the development at Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA. For 164 residential flats at 8 blocks we would recommend that the following waste and recycling provision is allowed for:

Building	Apartments	Plastics / Cans	Size litres	Glass	Size litres	Paper	Size litres	Card	Size litres	Food Waste	Size litres	Refuse	Size litres	# bins per store
N1	7	1	360	1	240	1	240	1	1100	1	140	1	660	6
N2	15	2	360	1	240	1	240	1	1100	1	140	1	1100	7
N3	43	2	1100	2	240	1	240	2	1100	2	140	3	1100	12
E1	20	1	1100	1	240	1	240	1	1100	1	140	2	1 x 660 & 1 x 1100	7
CTR	12	2	360	1	240	1	240	1	1100	1	140	1	1100	7
E2	12	2	360	1	240	1	240	1	1100	1	140	1	1100	7
E3	24	1	1100	1	240	1	240	1	1100	1	140	2	1100	7
S1	31	2	1100	1	240	1	240	2	1100	1	140	2	1100	9
Weekly collection		Refuse, Card & Food												
Alternate weekly TBC		Plastics / Cans, Paper & Glass												

The container numbers on page 71 of the design & access statement do not clearly break down the types, numbers, and volumes of bins for each store. The updated guidance notes do give more detail, but the developer must not assume dry recycled material is comingled or that all collections are weekly. For each of 37 residential houses we would provide the following suite of bins.

Container	Volume (litres)	Width (mm)	Depth (mm)	Height (mm)
Refuse bin	180	465	740	1070
Blue bag	90	450	450	450
Green recycling box	55	585	390	350
Black recycling box	45	585	390	285
Food waste bin	23	320	400	405
Kitchen caddy*	5	250	205	205

We

would urge at this stage of the planning process that the developers refer to the Planning Guidance for Waste and Recycling produced by Bristol Waste Company. When considering the layout, access and the design of the bin stores, this guide contains a wealth of information regarding the bin volumes, requirements etc.

https://www.bristol.gov.uk/documents/20182/239427/Waste+%26+Recycle+booklet.pdf/6d2822d9-9b14-40f1-8f85-0a47b20d5ce9_Sf-031

Bristol Waste vehicles will only collect from adopted highways. Any collections from private roadways would be by agreement with Bristol Waste and may need a covering letter of indemnity. I hope that this has provided sufficient feedback with regards to the areas of concern should this development progress from as proposed. Please note that the above comments are made on the basis and the quality of the information received to date and as such, they are made without prejudice to any further pre-application or application proposals which may raise further detailed questions or matters that are not currently considered within this response.

Thank you, Peter Hall Innovation & Sustainability Project Coordinator

Building Bristol - Employment and Skills

Date: 11th July 2022

Building Bristol are happy with the content of the employment and skills statement supplied by the applicant. This statement acknowledges the requirement for an employment and skills plan and the applicant has committed to ensure this is passed onto the developer when appointed. This requirement will be listed as a pre-commencement condition. Building Bristol would welcome early engagement with the developer, when appointed, to support them in providing a clearly defined Employment and Skills strategy.

Date 06th December 2022

Building Bristol acknowledge the Employment and Skills statement submitted by the applicant committing to the use of a local employment and skills plan.

Should permission be granted please ensure the following Pre-Commencement condition is included in the decision and that the £2000 Section 106 obligation fee is collected.

Employment and Skills Plan (ESP) Construction Phase

No development shall take place including any works of demolition until a Construction Phase ESP is submitted to and approved by the Local Planning Authority. The ESP is to be in conformity with the Building Bristol Guidance www.buildingbristol.com and will aim to maximise training and employment opportunities for local residents available during the construction phase of the development. The development shall thereafter be carried out in accordance with the approved ESP unless a variation in the plan is agreed in writing in advance by the Local Planning Authority.

Reason: In recognition of the employment opportunities offered by the construction phase of the development

Building Safety and Construction Division (HSE)

Date: 4th November 2022

Good Afternoon,

Thank you for your email.

In regards to your query, we previously informed you that as the case is under 18 metres we will not be providing comments on this case.

Kind Regards

Ethan Fakir

Operational Support,

Building Safety and Construction Division

Clifton and Hotwells Improvement Society 1 of 3

Date: 28th June 2022

Comments: The Clifton & Hotwells Improvement Society strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable in their current form.

The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape and skyscape of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique.

Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely ignored.

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

1. 201 dwellings represents a massively over-dense development of the site.
2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest.

3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the six storey block on the northern boundary.

4. The proposed terracing is not appropriate in this area.

5. The loss of trees will be compounded by the inevitable damage to the root systems of many other trees by infrastructure work.

We urge rejection of this highly damaging Application which, far from leaving a worthy legacy, would irrevocably damage one of the finest sites in Bristol.

Clifton and Hotwells Improvement Society 2 of 3

Date: 4th December 2022

The following represents a slightly revised version of the comments originally posted on August 7th.

CHIS strongly opposes these depressingly unimaginative and potentially destructive proposals which are entirely unacceptable.

The scheme includes half a mile of modern blocks of Flats several storeys high adjacent to all the Zoo boundaries which will dominate and overpower the neighbouring streets. This is especially the case along the west perimeter which would face the monolithic block proposed for the West Car Park site, permanently altering the feel, landscape, treescape, and skyscape of the Conservation Area. The scheme takes little, if any, account of the heritage, character and sense of space that makes this historic neighbourhood special, if not unique.

Despite strong concerns expressed during various public consultations, it has been the experience of residents that most of their concerns have either been dealt with only at the most basic or cosmetic level or just completely ignored.

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

1. 196 dwellings represents a massively over-dense development of the site.

2. Given the provision of only 100 parking spaces the circular access drive is likely to be permanently littered with cars and so appear even less discreet than the plans suggest.

3. The potential impact on the Conservation Area is poorly considered. In particular, the impact on the surrounding listed buildings and gardens of a development so monolithic in its scale and massing has not been justified. Especially appalling in this respect is the block on the northern boundary,

4. The proposed terracing is not appropriate in this area.

5. The loss of trees will be compounded by the inevitable damage to the roof systems of many other trees by infrastructure work.

We urge rejection of this highly damaging Application.

Clifton and Hotwells Improvement Society 3 of 3

Date: 23rd January 2023

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

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

Clifton College 1 of 4

Date: 22nd July 2022

Dear Case Officer

Response to Planning Application Reference 22/02737/F at Bristol Zoo Gardens, Bristol, BS8 3HA
Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings.

Introduction

Clifton College and the Bristol Zoo Gardens ('BZG') have existed side by side since 1862 and are both identified as defining features within the Clifton and Hotwells Conservation Area Appraisal. Clifton College is the most significant neighbour of the BZG with a number of school buildings on Guthrie Road, Northcote Road and College Road. Clifton College provides education for 1,300 pupils across the Nursery, Pre-Prep, Prep and Upper Schools. In addition to being a significant landowner in the vicinity of the BZG, Clifton College are also a major employer with 700 people employed in the local area.

As long-standing members and neighbours of the Bristol Zoological Society ('BZS'), Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however as an operational school with an overall responsibility for the safeguarding of its pupils the planning application raises a number of significant concerns for Clifton College which this letter addresses.

Engagement with BZS to Date

Representatives from Clifton College attended the public consultation events that took place in August/Sept 2021, November 2021 and March 2022 as well the wider Community Forum alongside local residents. Following the November 2021 public consultation, Clifton College raised a number of significant concerns directly with the BZS which included concerns in relation to safeguarding and overlooking into sensitive school buildings and grounds, highways safety, daylight/sunlight and heritage impacts. These concerns remained following the March 2022 consultation and it was requested that a further meeting between Clifton College and the BZS be held prior to the submission of the planning application. Clifton College met with the BZS team to discuss these concerns directly on the 9th June 2022 following the submission of the planning application. These concerns remain within the submitted planning application.

Key Concerns

Highways Safety

Clifton College has an overall responsibility for the safeguarding and safety of its pupils and has a particular concern in relation to highways safety. Clifton College has instructed Highgate Transportation consultants to review the planning application from a highways perspective. A technical note summarising their concerns is appended to this letter. An overriding concern is that the presence of a large operational school with children ranging from nursery age through to sixth form pupils on the boundaries of the BZG appears to have been given limited attention within the submitted Transport Assessment.

The College buildings are spread across an area that is intersected by six different roads. The operating functions of the College require significant movement of children of all ages, but predominantly those aged 11-18, without direct adult supervision, along and across College Road, Guthrie Road, Northcote Road and The Avenue, throughout the day and into the early evening, as they move between lessons and activities. As the College provides accommodation for around 350 boarding pupils, these movements extend to 9pm as pupils visit the sports centre, library and dining halls.

There are significant concerns in relation to the proposed access and circulation patterns associated with the masterplan. The proposed vehicular access points on Guthrie Road and at the top of Northcote Road directly conflicts with the access points for the College and the movement patterns of children. These roads at present are mainly used by Clifton College staff, pupils and parents rather than for general traffic movements. As noted above throughout the school day there are regular pedestrian movements of children as they move between lessons and between sites. There are particular concerns around conflicts at drop off and pick up times. The potential conflicts with the new access points are a significant safety concern particularly for some of the College's youngest pupils who are currently dropped off along Northcote Road.

There are also concerns in relation to the lack of road safety audits and in relation to the compliance of the parking surveys with Bristol City Council's guidance.

The coaches that Clifton College uses to transport its pupils to its sports ground in Leigh Woods park along Guthrie Road on a daily basis, in a location consistent with the location for the BZG coach parking. Any forthcoming Traffic Regulation Order ('TRO') amendment to the highway will need to consider the existing coach parking and the College's drop off and pickup requirements. Clifton College would resist a TRO which would significantly impact upon the existing operations of the College.

The attached Highgate Transportation Technical Note fully details the concerns of Clifton College from a highway safety perspective which we wish BCC to be aware of.

Safeguarding, Privacy and Overlooking

In relation to safeguarding there are significant concerns around the overlooking impacts of the proposed buildings into various sensitive College buildings, play areas and College grounds along both Guthrie Road and Northcote Road. Northcote Road in particular predominately houses the Preparatory School and the College's youngest pupils.

As an example, proposed building E3 to be sited at the corner of Guthrie Road and Northcote Road is located directly opposite Poole's House which houses prep school children aged 9-13 and also looks directly into the sports hall on Guthrie Road. The first floor podium garden and the balconies and terraces on the upper floors are a particular concern as these would look directly into these sensitive College buildings.

There is also overlooking from the proposed new building S1 on Guthrie Road into the South Town Day house and the Watson's Boarding house which house pupils in the Upper School.

The new pedestrian route between the new Building S1 and the Joseph Cooper Music school is also a concern. This new pedestrian route would bring pedestrians along a narrow path which has windows immediately onto the path within both the Joseph Cooper Music School and the new Building S1. Clifton College queries whether this route is necessary given there is a new pedestrian access point at the main gates on Guthrie Road. There is also an overlooking concern with the windows at the eastern end of the Joseph Cooper Music School and the windows at the western end of the new Building S1 looking directly onto each other in addition the overlooking potential and privacy issues arising from the new pedestrian route.

Daylight / Sunlight

We have reviewed the Daylight/Sunlight Report submitted in support of the application in relation to the impacts on the surrounding Clifton College buildings. Clifton College is concerned that there will be a reduction of the daylight/sunlight within a significant number of its buildings. Additionally there is no reference to potential design mitigations within the submitted report to address these impacts.

In relation to Poole's House on Northcote Road, the report identifies that 35% of windows would fail to meet the VSC guidelines and 25% would fail the NSI guidelines. It is noted within the report that 4 rooms located at lower ground level have the potential to receive a medium to high reduction in daylight levels (under the NSI measurement). The report notes that these are not believed to serve habitable rooms. Clifton College can confirm that these rooms are habitable rooms used as dining, social and study spaces. These are all used throughout the day and evening and therefore impacts on their daylight/sunlight is a material consideration which needs to be addressed.

It is also notable that for the South Town building (a boarding house on Guthrie Road) the report states that this building will have the highest amount of windows that will fall below the BRE recommendations. The report notes that this building is used as an events space, however this is a boarding house and therefore it is sensitive to this loss of light. The rooms on Guthrie Road include bedrooms for pupils and staff living within the building.

Finally, the Daylight and Sunlight Report does not assess the impact of the proposals on the existing play areas and amenity spaces that surround the site. The impact on these should also be assessed. Clifton College reserves the right to comment further on the daylight/sunlight position at later point during the determination of the planning application.

Heritage

Clifton College are the guardians of a significant number of heritage assets which includes locally listed and listed buildings, important open spaces, as well the Clifton College Local Historic Park and Garden which also has a protected view crossing over it (View LC24 as identified within the Conservation Area Appraisal). The Conservation Area Appraisal also notes that Clifton College is a

crucial landmark nationally and within Bristol. Clifton College is concerned that this sensitive heritage context has not been fully considered and appreciated within the planning application and within the submitted Townscape and Heritage Statements.

Christopher Balme Conservation has been instructed to review the planning application on behalf of Clifton College. The submitted Heritage Statement considers that the 'the introduction of bespoke, bold architecture into this historically separate and different site will have negligible impact to the setting of the listed buildings of Clifton College, nor to its locally-listed buildings along Guthrie, College and Northcote Roads.'

This is not correct, it is considered the scheme will have a significant impact on the setting of Heritage Assets. The proposed five storey, flat roofed, perimeter blocks would be a stark juxtaposition against the variety of Clifton College buildings and residential buildings that surround the site. The predominance of 'bold architecture' that does not respond to the context cannot be considered neutral.

Furthermore, the submitted Townscape Appraisal does not provide a clear overview of the views within the area as a comparison against the existing situation and therefore it is difficult to fully appreciate the impact the proposals will have on the character and appearance of the Conservation Area. To fully appreciate the impact on the setting of the Clifton College Listed and Locally Listed buildings it is important that the impact of the proposals within the setting of these buildings is fully considered. In particular the view across the Close Playing Fields towards the Clifton College buildings should be produced in order to confirm whether the BZG proposals are visible within the setting and backdrop of these important buildings. Clifton College has asked the BZS team if this view can be produced.

Clifton College reserve the right to comment further on the above heritage concerns during the determination of the planning application.

Design Concerns

Clifton College considers that the form and scale of the proposed buildings around the perimeter of the site are not sympathetic to the surrounding historic buildings. The scale and massing of the new buildings is also out of keeping with the surrounding buildings and townscape. In particular the scale of the 5 storey buildings along Northcote Road is not appropriate in comparison to the more modest scale of the adjacent Clifton College buildings which are generally 2 to 3 storeys in height . In addition the proposals will introduce the 4 storey Building S1 adjacent to the much lower rise Joseph Cooper Music School which is also locally listed.

Clifton College is concerned that the proposed perimeter buildings fail to conform to Policy DM26: Local Character and Distinctiveness, of the adopted Site Allocations and Development Management Policies Local Plan (2014). In particular it is considered that the proposals do not respond appropriately to the height, scale, massing, shape, form and proportion of existing buildings, skylines and roofscapes. It is considered that the proposals fail to reflect locally characteristic architectural styles, rhythms, patterns, features and themes taking account of their scale and proportions.

Demolition of the Conservation Education Centre

This building on Guthrie Road was only recently refurbished and extended. Clifton College questions the sustainability of demolishing a recently developed building and whether it would be more

appropriate to retain this in education use which would require minimal works given the existing use of the building.

Construction Impact

Clifton College is concerned around the construction impacts on its day to day operations as an existing school. In relation to the impacts of construction deliveries there is a highways safety concern as its pupils move between lessons on the surrounding streets. Construction noise is also a particular concern given the need for quiet to teach, conduct music lessons and to conduct examinations. Clifton College requests that it is consulted on any future Construction Environment Management Plan (CEMP) and Construction Method Statement (CMS) before it is approved by the Council so that its activities can be considered in the development of these documents.

Summary

As long-standing members and neighbours of the BZS, Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however Clifton College has significant concerns relating to the impact of the proposals as set out in this letter which will have a lasting detrimental impact on the College. We trust these comments will be taken on board by the Council in the determination of this planning application and

Htp/2250/TN/01/A Page 1 of 6

Highgate Transportation Ltd

First Floor, 43-45 Park Street, BRISTOL BS1 5NL

Company Registration Number: 07500534

TECHNICAL NOTE

PROJECT: Reps on behalf of Clifton College for Application 22/02737/F

REPORT: 2250/TN/01/A – Technical Note

DATE: July 2022

1. The focus of this report is to review the methodology outlined in the submitted transport assessment work to ensure that it is clear and robust.
2. It is considered that the largest omission in the transport assessment work is the lack of acknowledgement that Clifton College is located on at least two boundaries of the site, with students from nursery through to sixth form regularly walking (or being transported) to and from the various buildings on Northcote Road and Guthrie Road. These well-used desire lines associated with student movements are also ignored within the assessment.
3. The other two main issues that require resolution are:
 - i. The need for a Road Safety Audit Stage 1 to be provided regarding the proposed changes to the public highway arising from the new accesses and associated works, to ensure that confidence can be placed in the proposals at this full planning application stage.
 - ii. The non-compliant parking surveys need to be revised in accordance with the published Bristol City Council Parking Methodology.
4. These issues will be addressed in this report.

Background

5. An application (ref: 22/02737/F) has been validated on 13th June 2022 for the redevelopment of Bristol Zoo Gardens (BZG). The proposals include:

- i. 201 residential units (Class C3)
 - ii. the provision of community floorspace (Class E, F1 and F2)
 - iii. open space with associated landscaping
 - iv. play space
 - v. parking
 - vi. accesses (pedestrian, cycle and vehicular)
 - vii. infrastructure
 - viii. works to listed buildings
 - ix. selective demolition of buildings
6. The application was supported by a Transport Assessment and Travel Plan.

7. Clifton College is a day and boarding private school within Clifton, with the prep and upper school wrapping around the Zoo site. The operating functions of the school require significant movement of students of all ages, but predominantly those aged 11-18, without direct adult supervision, along and across College Road, Guthrie Road, Northcote Road and The Avenue, throughout the day and into the early evening, as they move between lessons and activities. As the College provides accommodation for around 350 boarding pupils, these movements extend to 2100 hours as pupils visit the sports centre, library and dining halls.

Traffic Generation

8. The submitted Transport Assessment sets out that compared to the existing BZG traffic generation, the forecast traffic generation from the redevelopment would be less and therefore there is a net traffic benefit of the scheme compared to the existing use of the site.

9. However, this does not take into account that the majority of vehicles associated with the BZG would be accessing the car parks on the A4176 and the overflow car parks accessed via Lady's Mile, rather than travelling on Guthrie Road and Northcote Road, where there is currently no access for BZG.

10. Therefore, this statement does not account for the increase of traffic on Guthrie Road and Northcote Road associated with the new vehicular accesses and the resultant increase in conflict between pedestrian and vehicle movements in this location, to the detriment of highway safety.

11. Furthermore, the proposed residential development peak hour traffic is likely to be 0800-0900 and 1700-1800. Given that the school operational hours are 0700-2100 with day pupils arriving between 0800-0900 and the majority leaving between 1600-1800, this will conflict with the vehicular movements of the residential aspects of the redevelopment (201 units; 118 parking spaces allocated), to the detriment of highway safety.

12. The transport assessment work cannot rely on the statement that "it is expected that many of the residents would be retired and so not exiting the site at peak times", given that the units proposed are not part of a retirement complex. This calls into question the validity of the transport assessment work.

College Road Access

13. The main site access is proposed as a new priority access arrangement to be provided on College Road, immediately south of the existing priority junction with Cecil Road i.e. a new staggered crossroad junction.

14. Given that this is a Full planning application, to include for access, this arrangement should have been supported by a Road Safety Audit Stage 1 to give the Council confidence that the provision of this access can be relied on, including confirmation of the acceptability of the swept path analysis and visibility splays provided.

Northcote Road Northern Vehicular Access

15. This new two-way vehicular access will be gated and closed at all times, opened with a fob and will be for resident access only. The access will be 4.8 metres wide and will allow two-way movements for cars (and cycles), with a pedestrian access immediately north, which will also be gated.

16. The vehicular access gate is to be set back 8.0 metres from the highway. The Transport Assessment sets out that this will allow one car to wait clear of the highway whilst waiting to enter through the opening gates, and that this would not impact the flow of vehicles on Northcote Road.

17. However, if two or more vehicles were to be waiting to enter the site, the second vehicle will be within the highway, therefore impacting the flow of vehicles on Northcote Road, and given that Northcote Road is a one-way road heading north, all vehicles waiting to access will be within close proximity to the school on the eastern side of the carriageway. No analysis has been carried out to confirm the likelihood of such an event occurring.

18. Furthermore, no Road Safety Audit Stage 1 has been carried out to give the Council confidence that the provision of this new access arrangement can be relied on.

Guthrie Road

19. The existing gated access on Guthrie Road is not currently in use. The access is directly opposite the Clifton College minibus car park.

20. It is proposed to utilise the existing gated access with cars having entry-only and cycles with two-way access. The width of the existing gates is 3.36 metres. This width is not suitably wide enough for a car and cycle to safely pass. Therefore, if a cyclist is exiting the development, a car will have to wait across the footway for the cyclist to emerge. This is therefore a highway safety issue and could result in conflict with pedestrians, especially school children, using the footway. This could also result in cycle/ vehicle conflict should they meet at the access. Again, no Road Safety Audit has been carried out to give confidence to this proposal.

Delivery Vehicles

21. It was noted from the recent meeting minutes between Clifton College and BZG that there is expected to be a concierge service to take deliveries. If this is implemented, and it is not clear that delivery vehicles cannot enter the development from Guthrie Road and Northcote Road, delivery vehicles are likely to circulate the outside of the development to find the correct unit.

22. Furthermore, given there is pedestrian access for staff/ deliveries/ maintenance from Guthrie Road, would this encourage the associated vehicles to wait on Guthrie Road –taking up on street parking and/or parking on double yellow lines. This has potential implications for Clifton College coach parking.

Parking

23. We do not agree with the statement that future residents of the development not being able to apply for a resident's parking permit removes the potential impact of overspill parking from occurring on a daily basis.

24. There is nothing stopping resident's owning a vehicle and parking it on street and using the pay and display between the hours of 0900 and 1700 Monday to Friday and feeding the meter, or parking only outside those times.

25. Therefore, we consider, as set out in the following paragraphs, that parking demand and impact on on-street parking has been underestimated and there is a lack of evidence to demonstrate that this has been assessed appropriately.

Visitor Parking

26. Regarding accommodating proposed visitor parking, the Transport Assessment summarises the following:

“Visitor car parking is proposed to be on-street making use of the existing pay and display bays. Parking surveys have identified that there is a significant amount of available on-street parking in the evenings, and the available on street parking during the day would increase once BZG has closed. Therefore making use of the existing available parking for visitors rather than providing new visitor parking is the most sustainable approach to visitor parking provision. This approach has been agreed with BCC highways officers.”

27. There is no quantifiable data included in the Transport Assessment to confirm that this is achievable.

28. We have concerns that the lack of detailed assessment on parking pressure has underestimated on street parking demand arising from the proposals (as well as the adjacent application for the residential redevelopment of West Car Park on College Road). This would lead to on street parking pressure issues and therefore an increase in vehicle movements as drivers circulate around the local roads looking for a parking space, resulting in an increased risk to pedestrian safety.

29. Furthermore, given the proposals require a review of the current Residential Parking Scheme (RPS) TRO in operation, and the future residents of the scheme will not be entitled to RPS permits, there is no guarantee that there will be enough on-street parking for visitors as this has not been quantified.

Parking Survey

30. The parking survey information provided is not sufficient or robust.

31. BCC guidance requires at least two weekday evening surveys and it is considered that in this instance, further surveys should be carried out during the operational hours of the RPS as well as surveys carried out to specifically pick up school drop-off and collection times. The Council’s guidance clearly states regarding surveys that:

- i. Parking availability on roads within 150 metres walking distance of the site
- ii. Snapshot survey Monday – Thursday 2200 – 0000
- iii. Morning and early evening surveys may also be required due to conflict with commuter / commercial use parking. In these cases, surveys between the hours of 0730-0900 and 1730-1900 may be required, noting the amount of parking on a 15-minute basis over this time
- iv. For a site near to an existing regular specific evening / weekend use which may impact on parking in the area, such as places of worship, evening leisure uses: additional surveys should be undertaken when these uses are in operation.

32. Also, whilst the Transport Assessment includes for two surveys, they do not mirror each other and are therefore unrepresentative for the analysis required.

33. It is understood that presently, with permission from BZG, students are dropped off and collected from the north car park, which is owned by the Downs Trust and used by BZG. Following the closure of the zoo, the loss of on street parking on Northcote Road will further compound issues in relation to school/drop off arrangements.

34. The information presented cannot be considered a robust record of current on street car parking activity or relied upon. Therefore, more surveys are required in line with the Council’s methodology to ensure a robust analysis and assessment of parking pressure has been carried out.

Accident Record Review

35. Whilst the Transport Assessment claims that there is no issue with the accident records, it has not been sensitive to the evidence that there is a history of accidents involving vulnerable road users. We

note that three uncontrolled pedestrian crossing points are proposed (kerb building outs with tactile paving and dropped kerbs on Northcote Road only), but query that this is substantial mitigation particularly as no account has been taken of the desire lines associated with the students at Clifton College.

Summary

36. In summary, it is clear that Clifton College has not been sufficiently acknowledged as part of the BZG application and given the close proximity of the school along the entirety of two of the BZG boundaries, this is a concerning admission.

37. The transport assessment work in support of the BZG application must demonstrate that the Clifton College desire lines have been taken into account and mitigated the effect of the development on highway safety, particularly that of child pedestrians and cyclists.

38. Furthermore, the Full planning application requires a Road Safety Audit Stage 1 to be carried out to review all accesses and associated works on the public highway to give the Council confidence that the provision of the access arrangements can be relied on.

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39. Additionally, the Transport Assessment's parking surveys are not in accordance with BCC methodology and therefore are not sufficient or robust. The parking surveys should be carried out again to provide further information that specifically picks up school drop off and pick up, as well as during the operational hours of the RPS, so that a robust assessment of the existing parking provision can be demonstrated.

40. Finally, formalisation of the existing coach drop off and pick up provision for Clifton College on Guthrie Road should be safeguarded and secured by relevant Traffic Regulation Order to ensure no impact following the closure of BZG and subsequent impact on on-street parking.

41. The Clifton College Coach drop off and collection arrangements pre-date the current RPS, yet have still to be taken into account.

Clifton College 2 of 4

Date: 28th November 2022

Clifton College's response to Revised Plans and Document relating to Planning Application

Reference 22/02737/F at Bristol Zoo Gardens, Bristol, BS8 3HA

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

Introduction

This letter provides a response in relation to the revised proposals to the above planning application submitted on the 27th October 2022 by Bristol Zoological Society ('BZS'). Previous objections were provided by Clifton College to the planning application as submitted within a letter dated 20th July 2022. This included a Highway Technical Note relating to the highway impact of the proposals provided by Highgate Transportation. This previous letter remains relevant and we request that this continues to be taken into account alongside this letter in Officers consideration of the planning application.

As long-standing members and neighbours of BZG, Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however as an operational school with overall responsibility for the safeguarding of its pupils, the revised proposals continue to raise a number of significant concerns for Clifton College, which this letter addresses.

Engagement with BZS Since Application Submission to Date

Clifton College met with the BZS team on the 9th June 2022 to discuss a number of concerns that remained unresolved within the submitted planning application. These concerns related to safeguarding and overlooking into sensitive school buildings and grounds, highways safety, daylight/sunlight and heritage impacts.

A meeting was held with the BZS team on the 21st November and although changes to the plans have been made, it remains the case that the proposals fail to deal with the detailed objections submitted by Clifton College. These concerns remain within the revised submitted planning application and are set out below.

Key Concerns

Highways Safety

Clifton College has an overall responsibility for the safeguarding and safety of its pupils and has a particular concern in relation to highways safety. Clifton College instructed Highgate Transportation consultants to review the planning application from a highways perspective. A technical note (the Highway Technical Note) summarizing highway concerns relating to the proposed development was appended to the first letter of objection dated 20th July 2022 which is enclosed with this letter for completeness.

An overriding concern is that the presence of a large operational school with 1300 children ranging from nursery age through to sixth form pupils on the boundaries of the BZG appears to have been given limited attention within the submitted Transport Assessment.

The school buildings are spread across an area that is intersected by six different roads. The operating functions of the school require significant movement of children of all ages, but predominantly those aged 11-18, without direct adult supervision, along and across College Road, Guthrie Road, Northcote Road and The Avenue, throughout the day and into the early evening, as they move between lessons and activities. As the College provides accommodation for around 350 boarding pupils, these movements extend to 9pm as pupils visit the sports centre, library and dining halls.

Traffic Generation

In relation to traffic generation, the submitted Transport Assessment (dated July 2022) sets out that the forecast traffic generation from the proposed development will be less than that of use of the site as a Zoo. The Highway Technical Note however considers that this fails to have regard to the difference in vehicle movements resulting from the redevelopment of the site which would see an increase in traffic in Guthrie Road and Northcote Road which would lead to an increased conflict between vehicle and pedestrian movements to the detriment of highway safety.

Proposed New Accesses

There are significant concerns in relation to the proposed access and circulation patterns associated with the masterplan. It is noted that the proposed vehicular access point on Guthrie Road is a one way entrance only for vehicles with vehicles exiting onto College Road during the morning peak. The Highway Technical Note provided by Highgate Transportation raised concerns that this is currently a gated access and is narrow and not wide enough for vehicles, pedestrians and cycles to access and use alongside each other. As has been set out, this could cause a highway safety issue for pedestrians, including school children as a car would have to wait over the footway if a cycle was exiting the site. This conflict remains and is likely to be made worse by the request in the revised proposals for increased opening hours from 8am which would introduce more vehicular activity along Guthrie Road at morning peak hours.

The Highway Technical Note previously stated that the proposed vehicular access point at the top of Northcote Road directly conflicts with the access points for the school and the movement patterns of children. The response to this from Savills dated 11th November 2022 sets out that this access will only serve the proposed northern block which has 21 residents parking spaces and that traffic movements would be limited. This does not overcome the comments raised to date that Northcote Road is mainly

used by Clifton College staff, pupils, and parents rather than for general traffic movements. As noted in the Highways Technical Note throughout the school day there are regular pedestrian movements of children as they move between lessons and between sites. There are concerns around conflicts at drop off and pick up times which will be more noticeable if the gates are allowed to open at 8am as is proposed. The potential conflicts with the new access points are a significant safety concern particularly for some of the school's youngest pupils who are currently dropped off along Northcote Road. The concerns expressed previously have not been overcome and furthermore a Road Safety Audit has not been undertaken of the proposed access.

The revised proposals introduce a new pedestrian access onto College Road, to the northern side of the proposed vehicular and pedestrian entrance. The Highway Technical Note previously identified the need for a road safety audit to be undertaken of the proposed access to establish that appropriate visibility splays can be provided. This work is still outstanding accordingly there is no technical evidence that the proposed access will be acceptable from a highway safety perspective when taking into account the various road users and in particular the more vulnerable users, namely pedestrian / school children.

Concerns are raised within the Highways Technical Note in relation to the lack of road safety audits for all the proposed accesses. It is requested that this matter is specifically dealt with, within this application submission.

We also ask you to revert to the previously submitted Highway Technical Note which also raises concerns relating to the proposed parking surveys that have been undertaken as well as concerns which persist about the impact on the existing coach parking and schools drop off and pick up points.

Safeguarding, Privacy and Overlooking

Previous safeguarding concerns were raised within our letter dated 20 July 2022. The response has been provided by Savills on behalf of BZG sets out that a minimum of 21m is achieved between habitable rooms and that cross sections will be produced to demonstrate the relationship between the proposed new buildings and existing Clifton College buildings. These cross sections have not been provided and we reserve our right to make further comments on safeguarding and privacy concerns, before the committee decision date until these have been made available.

In addition, there are legitimate concerns held by Clifton College relating to the increased permeability of the site. These have been raised previously in particular with the introduction of the new pedestrian route adjacent to the Joseph Cooper Music school which has not been addressed within the response provided by BZS, hence we refer to the original submissions in this regard.

The revised submission does not address the concerns raised in our previous correspondence and accordingly we would ask that these concerns are considered by Officers in the determination of the revised submission.

Daylight / Sunlight

It is noted that an updated overshadowing information has been provided within a letter from Delva Patman Redler (saved on the planning portal as Daylight and Sunlight Overshadowing Report Addendum). The response provided to Clifton College by Savills (11 November 2022) indicates that acceptable levels of daylight will be achieved at Pooles House and South Town. It is not clear however from the information provided within the Addendum, which provides no commentary on either of these buildings, how it has been judged that the two buildings which are both used as boarding accommodation would receive an acceptable level of daylight with development taking place.

In relation to Poole's House on Northcote Road, the Daylight and Sunlight Report (April 2022) states

that 4 rooms located at lower ground level have the potential to receive a medium to high reduction in daylight levels (under the NSI measurement). The report notes that these are not believed to serve habitable rooms. It was confirmed within Clifton College's previous submissions states that these rooms are habitable rooms used as dining, social and study spaces. These are all used throughout the day and evening and therefore impacts on their daylight/sunlight is a material consideration which needs to be addressed. It is not clear how this has been addressed within the revised submission and Daylight and Sunlight Addendum, accordingly the objections raised are retained.

In relation to Watson's House it is not clear if further information has been provided to the Council, but to confirm this is boarding accommodation and it is felt will be detrimentally affected by the proposal. It is also notable that for the South Town building (a house on Guthrie Road) the Daylight and Sunlight Report (April 2022) states that "this building will have the highest amount of windows that will fall below the BRE recommendations". The report notes that this building is used as an events space, with 30 windows facing the proposals. As has been set out in Clifton College previous submissions, this is a pastoral day house and therefore it is sensitive to the loss of light. The response from Savills (11 November 2022) states that South Town house will retain levels of daylights that are acceptable based on the use of the building, however no evidence has been provided to date to demonstrate that this is the case and accordingly the previous objections raised are pertained.

Clifton College remain concerned that there will be a reduction of the daylight/sunlight within a significant number of its buildings. In this regard there is no reference to potential design mitigations within the submitted report to address these impacts. Finally, the Daylight and Sunlight Report does not assess the impact of the proposals on the existing play areas and amenity spaces that surround the site. The impact on these should also be assessed.

Given the complexity of the report and issues raised, Clifton College reserves the right to comment further on the daylight/sunlight position at later point during the determination of the planning application. No later than an addendum objection statement submitted prior to the determination of the application at the planning committee.

Heritage

Clifton College are the guardians of a significant number of heritage assets which includes locally listed and listed buildings, important open spaces, as well the Clifton College Local Historic Park and Garden which also has a protected view crossing over it (View LC24 as identified within the Conservation Area Appraisal). The Conservation Area Appraisal also notes that Clifton College is a crucial landmark nationally and within Bristol. Clifton College is concerned that this sensitive heritage context has not been fully considered and appreciated within the planning application and within the submitted Townscape and Heritage Statements.

Christopher Balme Conservation has been instructed to review the planning application on behalf of Clifton College. The submitted Heritage Statement considers that the 'the introduction of bespoke, bold architecture into this historically separate and different site will have negligible impact to the setting of the listed buildings of Clifton College, nor to its locally-listed buildings along Guthrie, College and Northcote Roads.'

It is our considered view that this is not correct. The scheme will have a significant impact on the setting of Heritage Assets. The proposed five storey, flat roofed, perimeter blocks would be a stark juxtaposition against the variety of Clifton College buildings and residential buildings that surround the site. The predominance of 'bold architecture' that does not respond to the context cannot be considered neutral.

Furthermore, the submitted Townscape Appraisal does not provide a clear overview of the views within the area as a comparison against the existing situation and therefore it is difficult to fully appreciate the impact the proposals will have on the character and appearance of the Conservation Area. To fully

appreciate the impact on the setting of the Clifton College Listed and Locally Listed buildings it is important that the impact of the proposals within the setting of these buildings is fully considered. In this regard the local protected view across the Close Playing Fields towards the Clifton College buildings was requested within Clifton College's previous submissions in order to confirm whether the BZG proposals are visible within the setting and backdrop of these important buildings.

A Visually Verified Montage (VVM) (October 2022) view has been provided from across the playing fields however this only demonstrates the outline of the proposed South Buildings along Guthrie Road with a height of 3 to 4 storeys. Importantly, the VVM has been taken from the wrong location and therefore fails to provide a view and analysis from the corner of Pavillion Lane and College Road. It does not take into account the larger scale development that sits at a higher level, namely the proposed perimeter apartments that make up the North Buildings with a maximum height of 6 storeys or the East Buildings which range in height from 3 to 5 storeys. It is considered that the bulk and height of the North Buildings as well as the East Buildings will be visible from views across the playing fields towards Clifton College which will have a harmful impact on the setting of the Listed Buildings and the character and appearance of the Clifton and Hotwells Conservation Area. The VVM is enclosed for completeness.

It is also noted that a series of CGIs are being produced of the scheme as well as cross sections to show the relationship between the College buildings and the proposed development. These have not been provided at this current time.

Clifton College reserve the right to comment further on the above heritage concerns during the determination of the planning application. No later than an addendum objection statement submitted prior to the determination of the application at the planning committee.

Design Concerns

The revised proposals have introduced a number of design changes. Notwithstanding this, Clifton College continue to consider that the form and scale of the proposed buildings around the perimeter of the site are not sympathetic to the surrounding historic buildings or the character of the Conservation Area.

The scale and massing of the new buildings is also out of keeping with the surrounding buildings and townscape. In particular the scale of the East Building which rises to 5 storey buildings along Northcote Road is not appropriate in comparison to the more modest scale of the adjacent Clifton College buildings which are generally 2 to 3 storeys in height. The proposals will also introduce a 4 storey Building S1 adjacent to the much lower rise locally listed Joseph Cooper Music School. The design changes that have been introduced to the South Building along Guthrie Road include the introduction of vertical bays and realignment of windows however the scale and massing of the South Building S1 remains bulky, and its monolithic form is at odds to the variety at Clifton College and the character of the Conservation Area.

The design changes made to the proposed Northern perimeter building which include the stepping down of height, introduction of balconies and other design changes as illustrated in the Design and Access Addendum does not alter the scale and overall mass of the buildings. As such, as set out in previous submissions, Clifton College remains concerned that the proposed perimeter buildings fail to conform to Policy DM26: Local Character and Distinctiveness, of the adopted Site Allocations and Development Management Policies Local Plan (2014). In addition the residential elements of the scheme do not align with the principles contained within the Council's adopted Urban Living SPD (November 2018) in particular relating to responding positively to the context. It is considered that the proposals do not respond appropriately to the height, scale, massing, shape, form and proportion of existing buildings, skylines and roofscapes. It is also considered that the proposals fail to reflect locally characteristic architectural styles, rhythms, patterns, features and themes taking account of their scale and proportions.

Demolition of the Conservation Education Centre

This building on Guthrie Road was only recently refurbished and extended. Clifton College questioned the sustainability of demolishing a recently developed building and whether it would be more appropriate to retain this in education use which would require minimal works given the existing use of the building. The response provided by Savills sets out that the building has constraints and limitations that would impact on its ability to be re-used. Whilst this is noted other opportunities for the re-use of the building could have been explored. There is still an opportunity to impose a planning condition which states that the applicant should look into marketing the premises for re-use purposes for a period of 12 months following the potential grant of planning permission.

Construction Impact and Conditions

Clifton College have previously raised concerns relating to the construction impacts on its day to day operations as an existing school. In relation to the impacts of construction deliveries there is a highways safety concern as its pupils move between lessons on the surrounding streets. Construction noise is also a particular concern given the need for quiet to teach, conduct music lessons and to conduct examinations.

As set out in previous submissions Clifton College requests that it is consulted on any future Construction Environment Management Plan (CEMP) and Construction Method Statement (CMS) before it is approved by the Council so that its activities can be considered in the development of these documents. The response provided by Savills sets out that Clifton College will have the opportunity to discuss the detail of the CEMP and CMS once a developer is on board. It is not known when a developer will be on board and as such Clifton College reinforce a request to be consulted and that the Council attach appropriate conditions to any likely consent to ensure that such matters are appropriately conditioned.

Future Management of the Site

The future management of the site will to a large extent be dependent on the future developer/s which are not currently known. Clifton College wish to see that BZS remain involved in the future management of the site for the long term to ensure that the interests of itself and the wider community continue to be considered.

Summary

As long-standing members and neighbours of the BZS, Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however Clifton College still has significant concerns relating to the impact of the proposals as set out in the initial letter dated 21 July 2022 and within this letter which will have a lasting detrimental impact on the school.

We trust these comments will be taken on board by the Council in the determination of this planning application and we welcome a discussion with you in relation to these issues. Clifton College reserve the right to comment further on the planning application, no later than two days before the committee date, during its determination period.

Yours Sincerely

Tim Greene
Head of College

Nick Tolchard
Chair of Council

Clifton College 3 of 4 c/o Highgate Transportation

Date: December 2022

TECHNICAL NOTE

PROJECT: Reps on behalf of Clifton College for Application 22/02737/F

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1. This report has been provided by Highgate Transportation (HTp) further to Technical Note 01/A (dated July 2022) that was submitted to Bristol City Council as part of a wider representation on behalf of Clifton College.

2. Technical Note TN/02 will build upon the review in TN/01 and set out pupil movements and school activity to demonstrate the impact on pupil safety arising from the new accesses to the redeveloped Bristol Zoo Gardens (BZG) site on College Road, Northcote Road and Guthrie Road, and the subsequent residential traffic generated.

3. The BZG site is surrounded on at least two sides by Clifton College and the route for new residents and Clifton Village (for example) will increase vehicular movements on College Road and Guthrie Road – see Figure 1.

4. Furthermore, the proposed two-way vehicular access at the northern end of Northcote Road (see BZG masterplan contained in Appendix 1) will funnel new vehicular movements through a busy entrance/exit for around 200 Prep pupils (7-13 year olds); with the residential peak hours coinciding with school drop off in the morning and pick up late afternoon.

5. Clifton College is an Independent Day & Boarding School operating seven days a week 0845 to 1800 hours during term time for lessons (Monday through Saturday inclusive) with around 375 Boarders throughout the week (36 weeks of the year, with pupil movements across the local area between 0730 and 2200 hours seven days a week). See Appendix 2 summary of pupil movements, quantum, frequency and associated information. In addition, there is a Holiday Club (all holiday periods throughout the year, aside from the Christmas break) and other community activity.

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Figure 1 – Site context

6. Clifton College also holds charity and community events weekly, such as the Rotary Club concert, Independent Schools rugby tournament (500 people), Schools Triathlon (2,000 people), as well as have Residential lettings for local and International schools and community groups throughout the Easter and Summer holidays.

7. Given the above, it is clear that Clifton College is extremely busy, operating 52 weeks of the year, with thousands of pedestrian movements daily concentrated in and between Guthrie Road, College Road and Northcote Road in particular.

8. The main issue with the BZG application, as set out in Technical Note 01/A, is the omission that Clifton College has thousands of pupil movements (from the age of 4 years old) throughout the day, six days a week, walking to and from the various buildings on Northcote Road, Guthrie Road, The Avenue and College Road, as well as to New Field to the west, off Cecil Road and Percival Road. These well-used desire lines associated with pupil movements have been repeatedly ignored within the assessment work. See Appendix 3 for a visual representation of pupil movements.

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9. The transport work has failed to consider the impact of the vehicular trips generated by the redevelopment, with its new access points, on the pupils of Clifton College. Not only were the majority of vehicle movements associated with BZG confined to the northern side of the site (the A4176) i.e. away from Clifton College pedestrian movements, but the peak hours and peak season i.e. the busiest times for BZG trip attraction (as used for the baseline assessment in the transport work) do not coincide with the daily movement of pupils as would the proposed residential scheme.

10. Given this, the net traffic impact benefit cited in the application is of no significance when

considering the increase in vehicular traffic forecast on Northcote Road, Guthrie Road and College Road as a direct result of the redevelopment. This is to the detriment of highway safety of vulnerable road users.

11. The recent reduction from 201 to 196 residential units on the BZG site does not materially lessen the impact.

Local Highway Layout & Pupil Movements

Northcote Road

12. Northcote Road operates one-way (northbound only) with one footway around 1.8 metres wide on the eastern side and no footway on the western side. On-street parking, marked by dashed white lines, occupies much of both sides of the carriageway, with gaps for some property accesses. Northcote Road sees heavy pedestrian traffic throughout the day, particularly south of the entrance to the Prep school, as pupils regularly walk to and from facilities on Guthrie Road.

13. In summary, there are a minimum of around 100 pupil movements along Northcote Road hourly, rising to around 200 during the lunchtime period, up to around 400 pupil movements on Wednesday afternoons, and as many as 500 movements between 0745 and 0815 and also between 1600 and 1800 hours i.e. thousands of vulnerable road user movements per day.

14. Given this level of footfall, it is clear that further pedestrian movements on this single footway will result in either adults or children walking in the carriageway, significantly increasing the risk of a serious or even fatal pedestrian/vehicle collision occurring.

15. The proposed pedestrian crossing build-out from the BGZ site centrally on Northcote Road is clearly of no benefit to Clifton College pupils given there is to be no footway on the western side to cross to i.e. this is only a link to the site. It should be noted here that the transport assessment work failed to acknowledge the vulnerable road user personal injury accidents recorded.

Guthrie Road

16. Northcote Road forms a simple priority junction at its south eastern end with Guthrie Road. A raised table and carriageway narrowing provides a crossing over the north eastern arm of the junction, and the north western footway on Guthrie Road is built out to narrow the carriageway on the south western arm.

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17. In summary, there are a minimum of around 100 pupil movements crossing the carriageway at the junction of Northcote Road and Guthrie Road hourly, the majority of which are unaccompanied (aged 11-13) and accompanied (aged 4-11) pupils travelling between Northcote Road and Guthrie Road (west). This rises to at least 300 pupil movements crossing the carriageway at the junction during the morning and evening peaks. There are further east-west movements of around 100 Upper School pupils at the junction each hour.

18. It is clear that an increase in pedestrian and vehicle traffic across this junction will result in a corresponding increase to risk, particularly to the vulnerable road users - who are the main users of the junction. No improvements to the crossing facilities at this junction are proposed as part of the BZG development.

College Road

19. Guthrie Road forms a simple priority junction at its western end with College Road. A raised table covers the area of the junction, which forms an informal shared space between pedestrians and vehicular traffic and provides a calming effect to vehicles traversing the junction. Uncontrolled crossings are also provided on each arm, marked by tactile paving.

20. This junction facilitates a high number of pedestrian movements across it – at least 300 hourly throughout the day, with significantly more during the peaks, due in part to the College facilities on both sides of the roads and coach pick-up/drop-off point situated adjacent to the junction. These movements are made over all arms of the junction, and also diagonally across the carriageway.

21. It is understood that this arrangement operates satisfactorily with current levels of traffic. However, an increase in traffic during the peak hours and throughout the day (arising from the new access locations around the BZG site on key roads) is likely to result in serious additional risk to the vulnerable road users crossing at this junction.

22. College Road is a single carriageway road, with footways around 1.9 metres wide on both sides of the carriageway. On-street parking, marked with dashed white lines, is present along much of the length of the road on both sides. College Road, at and south of Guthrie Road is an important thoroughfare for pupil movements to, from and around Clifton College, as college facilities and pupil accommodation buildings are located on this road. Pupils accessing the College from accommodation on the western side of College Road cross the carriageway, and vice-versa. A zebra crossing facilitates some of these movements, however, it is located off the main desire lines. Informal crossing movements are common throughout the day, at around 200 pupil movements per hour.

Access to New Field

23. New Field lies to the west of the main Clifton College buildings and facilitates rugby and cricket activities. It is also occasionally used for large-scale parking for events held by Clifton College.

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24. These pedestrian movements are made via Percival Road or Cecil Road, with up to around 150 pupil movements in an hour cross this junction during the day when accessing New Field, with significant increases on event days, which may see many hundreds of pedestrian movements in a short space of time. See Appendix 2.

Deliveries

25. Throughout the day, deliveries to the college are made at Porter's Lodge, situated on Guthrie Road approximately opposite the junction with Northcote Road. A loading bay is marked on the carriageway with dashed white lines, with space for two vans or LGVs.

26. Catering deliveries are made to the college to a loading area on the south side of Guthrie Road. A dropped kerb forms a vehicle crossover of the footway, allowing LGVs and HGVs to reverse into the loading area. It is noted that the loading area is not large enough to accommodate a large HGV, which blocks the footway and protrudes into the carriageway during unloading.

Coach & Mini-Bus Travel

27. Coaches and minibuses are regularly used to transport pupils attending Clifton College to the Sports Ground in Leigh Woods or to other schools for fixtures. There is a coach pickup/drop-off point on the north side of Guthrie Road, close to the junction with College Road. Coaches pick up and drop off pupils here multiple times Monday to Saturday to transfer pupils between sites. Coach movements during term time are listed in Table 1.

Table 1 – Coach movements on Guthrie Road

Table 1 – Coach movements on Guthrie Road

Day	Time	Pick-up/drop-off	Number of Pupils	Pupil age group
Monday	1400	Pick-up	100	Upper
	1430	Pick-up	200	Prep
	1600	Drop-off	100	Upper
	1700	Drop-off	200	Prep
Tuesday	1330	Pick-up	655	Upper
	1730	Drop-off	655	Upper
Wednesday	1330	Pick-up	400	Prep
	1600-1700	Drop-off	400	Prep
Thursday	1330	Pick-up	655	Upper
	1730	Drop-off	655	Upper
Friday	1430	Pick-up	200	Prep
	1700	Drop-off	200	Prep
Saturday	0930	Pick-up	200	Prep
	1100	Pick-up	200	Prep
	1100	Drop-off	200	Prep
	1100	Pick-up	655	Upper
	1230	Drop-off	200	Prep
	1900	Drop-off	655	Upper

28. Minibuses operate daily, transporting pupils to various locations. These minibuses operate to and from a parking area accessed via a crossover on the south side of Guthrie Road.

BGZ Traffic Generation

29. The submitted transport assessment work has again been reviewed and in the context of the expected rise in vehicle/pedestrian conflict on College Road, Guthrie Road and Northcote Road, can be summarised as:

- i. 752vpd forecast from the development (using very low trip rates) – 635vpd of these are residential trips
- ii. 53vph in the AM peak hour of 0800-0900 i.e. one vehicle per minute
- iii. 48vph in the PM peak hour of 1700-1800 i.e. one vehicle per minute

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

Summary

31. In summary, it is clear that Clifton College has not been sufficiently acknowledged as part of the BZG application and given the close proximity of the school along the entirety of two of the BZG boundaries, this is a concerning admission.

32. No account of desire lines associated with the pupils at Clifton College has been taken into account, or of the significant volume of pedestrian movements in this location that occur hourly throughout the day.

33. It is also clear that the BZG proposals do not mitigate the impact the redevelopment will have on Clifton College pupils and the road safety dangers arising.

Clifton College 4 of 4

Date: 31st January 2023

Dear Case Officer,

Response to revised plans and additional supporting documents relating to planning application reference 22/02737/F at Bristol Zoo Gardens (BZG), Bristol, BS8 3HA

Description of Development:

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

Introduction

This letter provides a response in relation to the revised proposals to the above planning application submitted on the 12th and 13th January 2023 by Bristol Zoological Society ('BZS'), with a particular emphasis on those areas of change included within the proposal including: safeguarding, privacy and overlooking, daylight/sunlight, highways and Verified Visual Montage, Areas of Comparison and Heritage. As long-standing members and neighbours of BZS, Clifton College are supportive of the BZS in securing its future for the continued conservation of its animals and to support the vital education they provide for the wider community. Clifton College acknowledges that the site will need to be developed however, as an operational school with overall responsibility for the safeguarding of its pupils, the revised proposals continue to raise a number of significant concerns for Clifton College, which this letter addresses.

Engagement with BZS Since Application Submission to Date

Clifton College met with the BZS team on the 9th June 2022 to discuss a number of concerns that remained unresolved within the submitted planning application. These concerns related to safeguarding and overlooking into sensitive school buildings and grounds, highways safety, daylight/sunlight and heritage impacts.

More recently Clifton College have been contacted by the BZS team to discuss the revised submission and a formal response to the objections raised by CC to the planning application was provided on the 11th November 2022. This response was received following the submission of the revised proposals to the Council which took place on the 26th October 2022.

A meeting was held with the BZS team on the 21st November 2022 and it remains the case that the proposals fail to deal with the detailed objections submitted by Clifton College. These concerns remained within the initially revised submitted planning application and concerns were again set out in a letter submitted to yourself on the 28th November 2022 (collated version 21st December 2022). The letter addressed the College's concerns around highways safety, safeguarding privacy and overlooking, daylight/sunlight, heritage, design, demolition of conservation education centre, construction impact and future management of the site.

An additional Technical Note on Pupil Movements, prepared by Highgate Transportation was submitted for consideration by Bristol City Council on 6th January 2023.

Safeguarding, Privacy and Overlooking

Previous safeguarding concerns were raised within our letters dated 20th July and 28th November 2022. Previously, a response had been provided by Savills on behalf of BZG setting out that a minimum of 21m is achieved between habitable rooms and that cross sections will be produced to demonstrate the relationship between the proposed new buildings and existing Clifton College buildings. Four updated plans and section drawings have been submitted namely; BUILDING_DISTANCES_-_E1_SECTION___PLAN-3378460, BUILDING_DISTANCES_-_E2_PLANS___SECTIONS-3378461, BUILDING_DISTANCES_-_

_S1_SECTION-3378453 and BUILDING_DISTANCES_-_E3_SECTION__PLAN-3378455. However, none of these sections demonstrate a significant increase in building distances with a number of distances either remaining the same or increasing only by nominal amounts e.g. 20cm. In the context of the overall proposals, these increases in distance are considered minimal and it is the view of the College that the proposed changes do not go far enough to reduce the risk of overlooking.

The College observe that a number of minor changes have been made to the proposed southern and eastern elevations of Block E1 (shown in plan BLOCK_E1_-_PROPOSED_ELEVATIONS_-_SOUTH__EAST-3378662) and the proposed north and east elevations of Block E2 (shown in plan BLOCK_E2_-_PROPOSED_ELEVATIONS_NORTH__EAST-3378667). The 'Response to the Case Officer's document submitted as part of the revised proposals outlines that Block E1 has been amended as follows (extract from Response to Officer document in bold):

- Incorporation of eight angled bay windows with translucent glazing (to 1.7m) on eastern elevation to overcome potential overlooking concerns. This is shown on the updated elevations and floor plans.

And that:

Block E2 has been amended as follows, to better configure its relationship to the Hornby Arts Centre:

- Level 1 - revised design of layout on level 1 with reconfigured 2bed apartment
- Level 1 & 2 – 3 bed apartment - reconfiguration of bedroom and hall to increase distance between windows of neighbouring building

In response to the proposed elevation changes to Block E1 the College note that the differences in proposals are marginal. With 16no. 'windows with recessed brickwork' changed to 'Angled bay window with translucent glazing (to 1.7m above FFL) facing east to Northcote Road. Clear opening side light facing south.'

The introduction of the new window proposals do not completely alleviate the College's overlooking concerns. There are still 28no. bedroom windows visible on the proposed eastern elevation. Block E1 is located to the north east of the BZG site fronting Northcote Road, immediately opposite the College's Preparatory School Main Building (Building 4)¹ and Mansfield's House (Building 3).

As such if the proposals were to wholly alleviate the College's safeguarding concerns around overlooking and to provide a truly acceptable level of privacy for neighbouring uses and future residents of the new development the College request that the window alterations be made to all windows on that elevation, particularly those which face into/out of a bedroom.

Block E2 is located to the east of the BZG site fronting Northcote Road, immediately opposite the College's assets at 7- 8 Northcote Road (Building 7) which includes the Director of Safeguarding's office, Prep School Counsellor, Chaplaincy and multi faith room, Prep EAL and learning support department, the Hornby Arts Centre (Building 9) and Bretten Memorial Hall (Building 8).

The proposed changes to the layout of apartments is marginal and does not result in a notable increase in distances between the proposed building and the College's assets, as such the College consider their concerns around safeguarding and overlooking to still apply in this instance.

In addition, there are legitimate concerns held by Clifton College relating to the increased permeability of the site. These have been raised previously in particular with the introduction of the new pedestrian route adjacent to the Joseph Cooper Music school which has not been addressed within the response provided by BZS, hence we refer to the original submissions in this regard. The updated plans do not address these concerns.

The revised submission does not address the concerns raised in our previous correspondence and accordingly we would ask that these ongoing concerns are considered by Officers in the determination of the revised submission.

Highways

An internal distribution plan demonstrating the proposed internal movements of pedestrians, cars and other vehicle movements has been provided as part of the updates. However, the plan does not outline Building Numbering as Shown on Clifton College Main Campus Map. Accessible Here: [Clifton-College-Main-Site-SEP-2020_PRINT-scaled.jpg \(2560x1812\) \(cliftoncollege.com\)](#) the breakdown of transport movements into and out of the site. For completeness, the College request the plan be updated to include this.

A Site Access Strategy plan has been provided which identifies all of the site entrances and whether that entrance is accessible for pedestrians, cyclists, resident's car access or service vehicles/delivery vehicles. However, this plan does not demonstrate the volume of movement into and out of the site and the College request that the plan is updated to reflect this.

In the absence of any further updates to details around transportation and highways at the site, the College consider that their concerns around increased vehicle movements and potential risk to the College's pupils have not been addressed. As such the College would ask that their concerns highlighted in previous correspondence are still duly considered by Officers in advance of the application going to Committee in March 2023.

Verified Visual Montage, Areas of Comparison and Heritage

A Visually Verified Montage (VVM) view has been provided from across the College playing fields (The Close), from the base of the Cricket Pavilion. However, this only demonstrates the outline of the proposed South Buildings along Guthrie Road with a height of 3 to 4 storeys and not the larger scale development that sits at a higher level, namely the proposed perimeter apartments that make up the North Buildings with a maximum height of 6 storeys or the East Buildings which range in height from 3 to 5 storeys. Additionally, the proposed view included within the VVM is neither taken from the protected Local View (LC24) which runs from the south-west corner of the College's Grounds or the identified Long View (L25) as identified in the Clifton and Hotwells Conservation Area Character Appraisal (CACA) Important views and Landmark Buildings Map. Long views are long distance views across the City to key features or landmark buildings. In this instance Long View L25 stretches from the grounds of Clifton College northwards across the College and BZG site, both of which are identified within the CACA as Landmarks of City-wide importance. As a consequence of this the College consider the VVM does not accurately reflect those protected views, as identified in the CACA, and request an updated VVM which accurately reflects the impact of the proposals at the BZG site on Local View LC24 and Long View L25.

It is also noted that a series of CGIs of the scheme have been produced (dated 5th December 2022). However, the additional views of Northcote Road, as outlined in the 'Response to the Case Officer' document have not been formally submitted as part of the application as they are not 'settled CGIs' and as such cannot be considered in the overall determination of the proposals. The College request that these additional CGIs be updated and formally submitted for due consideration, as an important part of the overall application.

A detailed areas of comparison document (ref: AREAS_OF_COMPARISON-3378471) has also been provided. These plans are useful in demonstrating areas of comparison between existing and proposed areas across the site including play, lake/wetland, buildings and hardstanding and public/private areas.

Clifton and Hotwells Conservation Area Character Appraisal Important views and Landmark Buildings Map. Accessible Here: <https://www.bristol.gov.uk/files/documents/2928-cliftonfinaljulyjustmaps/file>

However, these are only in 2D and show only land take, with no consideration for heights, daylight/sunlight, and the orientation and layout of the development. As such the College requests that consideration be given to the wider documentation available to ensure that all elements of the proposal are duly considered.

Daylight/Sunlight

Further to our letter dated 28th November 2022, no additional detail concerning Daylight/Sunlight has been provided, with only a Tree Shade Analysis provided in the updated documentation (ref: SHADE_ANALYSIS_-_APPENDIX_9-3378482), as such the College's concerns around material impacts on boarding houses and daylight/sunlight have not been addressed and the College request these outstanding queries be addressed ahead of a decision being made on the application.

Summary

Clifton College acknowledges that the BZG site will need to be developed however the College has significant concerns relating to the impact of the proposals as set out in previous correspondence and within this letter which will have a lasting detrimental impact on the College and its pupils. We trust these comments will be taken on board by the Council in the determination of this planning application and we would welcome a discussion with you in relation to these issues. Clifton College reserve the right to provide further comment, as required, during this determination period on the planning application, no later than two days before the committee date (March 2023).

Yours Sincerely

Dr Tim Greene

Head of College

Conservation Advisory Panel 1 of 2

Date: 5th July 2022

Commenter Type: Conservation Advisory Panel

Stance: Customer objects to the Planning Application

Comment Reasons:

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

This is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over intensive with a consequential poor relationship with the adjacent School and its listed buildings. The north building at 6 storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular, the Bear Pit would be overly dominated by new development.

There are concerns with the impact on retained green infrastructure. Particularly with regard to the

buildability of the quantum of development whilst retaining the specified trees. There are significant questions over the long term maintenance of the proposed public space. The gardens are a locally listed heritage asset. The Grand Terrace is a defining feature of the gardens and is not worthy of being used as a deliveries and service route. The circular road to access houses needs to be rethought. There is concern that there will be insufficient car parking provision, which will result in the reality of extensive areas of on street parking throughout the site. Consequently, it is considered that the proposal would neither sustain nor enhance the significance of relevant heritage assets including the Conservation Area and listed buildings within and without the site. It would provide insufficient substantial public benefit to outweigh the substantial harm caused by the impact of such a poor scheme on the relevant heritage assets. It is not considered that this scale of development can be justified in a heritage context. Moreover, it accords with neither the relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported.

Conservation Advisory Panel 2 of 2

Date: 22nd November 2022

Overall Comment

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

Harm to overall historic interest and significance of site

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

Loss of Communal Value

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

engraved in the psyche of thousands and will be lost or unavailable under this scheme. The communal value of this site cannot be underestimated and once lost will be gone forever.

Harm to listed buildings

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

Justification of harm

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

Alternatives

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

While the governance of the Zoo is that of a limited company, it is also a charity with long-standing public responsibility. While it is acknowledged that the Trustees have fiduciary duty, the Objects of the Charity itself are to promote the public understanding and the conservation of wildlife and the natural environment and the scientific study of plants and animals. This housing estate proposal does not deliver either of these, while an alternative, perhaps in association with a body such as the Eden Project or the RHS, would do so.

Public amenity

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

Design

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

Landscape

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

Cars and Parking

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

Conclusion

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

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

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

Crime Reduction Unit

I am a Crime Prevention Design Advisor (CPDA) with a responsibility for Crime Prevention Through Environmental Design (CPTED) projects within the Bristol area. As a Constabulary we offer advice and guidance on how the built environment can influence crime and disorder. Paragraphs 92, 97 and 130 of the National Planning Policy Framework (adopted July 2021) require crime and disorder and fear of crime to be considered in the design stage of a development. Other paragraphs such as 8, 97, 106, 108, 110, 112 and 119 (also require the creation of safe environments within the context of the appropriate section. The Bristol Development Framework Core Strategy (adopted June 2011) states that one of the overarching issue for ensuring a sustainable future is reducing the opportunity for crime. Bristol Local Plan Site Allocations and Development Management Policies (Adopted July 2014) section DM28: Public Realm states that Development should create or contribute to a safe, attractive, high quality, inclusive and legible public realm that contributes positively to local character and identity and encourages appropriate levels of activity and social interaction. Section 4 adds that development will be expected to: Reduce crime and fear of crime by creating a well-surveyed public realm that is well managed and cared for; I have viewed the planning application and have the following comments. I acknowledge the comments regarding security in the Design and Access Statement and show them below. Crime prevention through environmental design (CPTED) and Secured by Design (SbD) principles have been applied to the whole development. This includes layout of roads, footpaths, parking, lighting, communal areas, boundary treatments and layout and orientation of dwellings. Communal areas, playgrounds and seating areas have been designed to allow supervision from nearby dwellings with safe routes for users to come and go. Boundaries between public and private space are clearly defined and open spaces have features which prevent unauthorised vehicular access, such as edge treatments and bollards. Undercroft parking is access controlled and covered parking areas are passively surveyed by neighbouring properties. Rear covered car parking is proposed to the service road between the northern apartment blocks and the boundary wall but is securely gated at each end and is within the guidelines contained in the Bristol City Council SPD, Local Plan and Manual for Streets. Communal cycle parking is secure with access control and CCTV. Communal parking facilities will be lit to the relevant levels as recommended by BS 5489:2020. The proposed S1 apartment building serves over 25 flats (31 no.) sharing a single core. It can be compartmentalised using access control to prevent the free unlawful movement through the structure. I would like to add the following points. There is mention of discreet undercroft parking (landscape statement p.49). Whilst the image shown maybe indicative of the design, this type of arrangement (if open) can make the vehicle and any door set or window within the undercroft vulnerable. External cycle storage for the dwellings should meet LPS 1175. Any communal mailboxes must meet the requirements of TS 009. The management plan should demonstrate how the site will be secured outside of daylight hours. I would also like to add that the affordable housing will have to satisfy the LPAs Affordable Housing Practice Note (April 2018) which needs to meet or exceed the standards specified in the former Housing Corporations Design and Quality Standards (published April 2007). This document states, ensure that the scheme design reflects advice obtained from local police architectural liaison officers/crime prevention design advisors prior to detailed planning stage and obtain Secured by Design certification wherever possible. As such we can provide advice on Secured by Design, from the outset. If there are any questions concerning these comments, then please feel free to contact me.

Peter Wozniak Crime Prevention Design Advisor.

Design West

Date: 26th July 2022

Dear Geraint

DESIGN WEST BRISTOL Design Review

DWB046 Bristol Zoo Gardens 11 July 22

Thank you for returning with the above scheme to Design West for the third time and giving us the opportunity to comment on the proposals now submitted as a full planning application as well as for listed building consent for this extremely attractive and significant site. We would also like to thank the client team, Penoyre & Prasad, LUC, Alan Baxter, Max Fordham and Savills for attending the review and their clear and very comprehensive presentations and detailed information. The panel recognises the quality and extensive work carried out since the last review by the Bristol Zoological Society and the whole design team to provide a residential development on this site of complex location, size and constraints.

This letter summarises the recommendations made by the panel on the day.

Declarations of Interest: None

The Site and Proposals

The proposals are for Bristol Zoological Gardens ('Bristol Zoo'), a 12 acres local historic park and garden located within the Clifton and Hotwells Conservation Area. The site is bound by the A4176 with the Downs behind to the north, College Road to the west, Guthrie Road with Clifton College to the south and Northcote Road to the east. The site is currently surrounded by walls, given its current use as a zoo, some of them listed.

The site itself includes listed and locally listed buildings and is within the setting of a number of listed buildings, the majority of which are part of Clifton College. Following a comprehensive assessment of the site by Historic England in 2021, there are now six Grade II listed buildings/structures on the site: The Monkey Temple, the former Bear Pit (the current Aquarium), the Birds of Prey Aviary, the northern Entrance Lodge building, the former Giraffe House (the current Gorilla House) and the southern entrance gates with their flanking walls. Clifton Pavilion in the western side of the site is locally listed.

The site is also designated Important Open Space with a number of the trees subject to Tree Preservation Order no. 1438. The use as a zoo represents a valued and much-loved community facility, which is acknowledged by its nomination to the Council's Assets of Community Value List.

The proposals are for 201 dwellings (a reduction of 4 dwellings since the last review) with 20% affordable homes, the reuse of the entrance building as Clifton Conservation Hub, reuse of the Terrace Theatre and enclosures as follies in the landscape, 118 parking spaces (a reduction of 5 spaces) and associated landscaping, most of which will be retained from the zoo gardens. The existing lake will be reshaped. Building heights range from 1-storey (mainly existing) to 6-storeys in the Northeast corner.

Main Discussion Points

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

The panel welcomed the clearer narrative 'Bringing people together' and 'Connect people and wildlife' but felt that the vision and actual design response have not been fully aligned yet. It needs to be absolutely clear how the site is to be managed and controlled and how residents are going to be interacting with visitors to the park. Potential phasing, buildability and provision of sufficient working space should also be considered at this stage.

The following will pick up points as they arose during the review, referring back to the principles and headlines of the WECA Placemaking Charter.

Employer's Requirements: Leaving these decisions to the contractor without setting direction and definitive targets might not get the desired outcome. These should also be supported by detailed

planning drawings and documents. The detail of some of those features also needs to be worked through further such as e.g. cleaning/maintenance of the PVs on the lake houses.

The panel noted that some of the targets are currently not sufficiently ambitious e.g. the embodied carbon target just hits a low rating regarding the LETI 2020 target, whereas the scheme will most likely not be completed before 2024.

The panel welcomed the TM59 calculations although these were currently only available for the new built elements. Some of the existing buildings have challenging elevations regarding overheating such as the Clock Tower and Clifton Pavilion, which need to be considered in more detail.

U-values identified for retrofit elements also appear - although welcomed - very ambitious and should be double-checked if these can be achieved in reality. 'The Bristolian's Guide to Solid Wall Insulation' is a useful guide to consider.

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

The overarching idea of a permeable site with a publicly accessible park has been developed further with further openings in the boundary wall although the panel felt that the permeability needs to be taken further. The perimeter blocks follow the boundary walls, and the idea of garden pavilions which sit in the landscape has been retained. There is still a clear tension between creating a welcoming park for the whole community and a walled housing development, and the pedestrian experience needs to be considered further to ensure all access points and routes appear inviting. The panel therefore questioned the extent of the wall and encouraged the team again to free themselves further from the constraints of the wall and be more ambitious, given the site will have a different use and be truly for all Bristol people. This will be discussed further under the 'Characterful' item.

The public access plan was useful although the out of hours access on the access plans needs to be thought through in more detail.

The transport concept in itself was not discussed at this review.

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

The vision of connecting people and wildlife is highly commendable. It is important though to give the community as much access as possible to enjoy the gardens. A clear separation between public and private is useful, possibly even with clearer boundaries as currently shown to define the boundaries and have less reliance on informal defensible space. Balconies as private amenity space work well although the panel is not clear if the planting on balconies to showcase the greenery can and should be maintained by the management company.

'Health & Wellbeing' should feature in the overall cultural plan for the site.

The panel was pleased to see a significant improvement in biodiversity net gain. This item and soft landscaping/planting were not discussed in detail.

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

As mentioned above and in the previous review and letter, the team should bear in mind that the site will change its purpose through a different use. The connections and relationships the development creates with its neighbouring context therefore should be thought of in a different way- opening itself up to its neighbours and the community. We encourage the project team again to challenge the extent of 'the wall' and break it up further as we are concerned about the impact it has on its context as a residential development. There are numerous examples of activating walls and making them more interesting/including them as part of a development which we encourage the design team to study, including incorporating front doors into it. The walls' heritage should be used to communicate a new story and further development of the site.

The walls certainly are part of the character of the site, but it will be more important what visitors see when they look beyond the wall and through the gates. Certain entrances, especially at the north-east corner still do not appear welcoming and dominated by barriers to the development. The view from College Road appears to be of a private lake house rather than an inviting vista to the community garden and the lake which needs to be addressed.

We are therefore still concerned that the vision statement of 'connecting with the community' has not been fully delivered through the design proposals.

Visual Impact and massing

The panel was disappointed that simple CGIs and contextual sections still had not been produced despite the team building a 3D model. The panel recommended this to use very much as a design tool to study the impact of the scheme from the outside rather than just creating high-end CGIs for the application and to attract future developers. The design team should be focusing less on an internalised development and better consider links and relationship to its neighbours.

The panel was pleased to see that the height has been slightly reduced on the north side although the current perimeter block proposals still appear unfriendly and not sufficiently modulated so they reinforce the sense of a physical perimeter barrier, impacting on the surrounding scale of buildings in the conservation area. Especially the north elevations appear unrelenting, too high and need breaking down further.

A contextual section will also help to understand the impact on the listed neighbouring College. The panel was concerned about the straight façade as originally submitted which appeared unrelenting and overpowering. The panel welcomed early revised sketches by P&P which broke down the mass visually and responded to the rhythm of the College façade. A similar approach should be taken for the north elevation.

Unfortunately, due to limited time the panel did not get a chance to discuss the layouts or all elevations in more detail.

The panel was very concerned that the scheme might be watered down once a developer/contractor comes on board. The panel strongly recommended to include further detail in the planning application such as 1:20 sections of the façade build up, depth of reveals, details of brick etc. to make this part of the approved planning application pack. Should changes be proposed later, BCC has a mechanism to control these. An outline specification should be included in the ERs to at least fix the quality of the proposals. The panel appreciated that the client does not want to be too prescriptive but was concerned that the overall quality might suffer if proposals are kept too vague.

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

It is highly commendable Bristol Zoological Society is keen to leave a legacy to support the creation of a new community. The panel is still concerned though that the site might not appear sufficiently welcoming. The presence of gates will always be a psychological barrier to true permeability of the site.

The panel was pleased to hear that a process will be put in place where a management board including representatives from BCC, BZS, residents, an arts consultant etc. will be involved in future decisions. Care should be taken to achieve the right representation. True connections with the community will help deliver the mission statement.

The panel also heard that there will be a charge for residents to pay towards the upkeep of the park. We felt that there needs to be clarity on the level of influence that future residents can and will have in order to be able to retain the public access model for the future. Also, a broader perspective looking further than the actual site is welcomed. We are concerned though if the planning system will be able to support this aspiration sufficiently and urge the BZS to include as much detail in the ERs as possible for the future developer and contractor.

Summary

Thank you again for returning to Design West with your more detailed proposals for this important and well-loved site. We encourage you to align the proposals fully with the vision and create a more welcoming, permeable development which links to the neighbouring context - the treatment of the boundary walls will be key to this.

We are also still concerned that the principles and quality of the scheme are not sufficiently clearly set out to ensure the initial design intentions will be retained when a developer and contractor come on board. Please refer to the comments above for the detail.

We hope you found the advice contained in this letter helpful and are looking forward to seeing the proposals evolve further in dialogue with Bristol City Council during the planning process.

The guidance set out in our previous letters is also still valid.

Yours sincerely

Cora Kwiatkowski RIBA

Co-chair Design West

Downs For People

Date: 19th August 2022

DOWNS FOR PEOPLE

For ever unenclosed, for all to enjoy

Comments on planning applications 22/0737/F and 22/02889/LA:
development of Bristol Zoo's Clifton site for housing

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

Summary

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

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

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

- 1) Visitor numbers have never been constrained by lack of parking: in its annual accounts the zoo has identified this only as a possible future risk.
- 2) DfP's successful High Court challenge did not result in the zoo being left with no parking. It still had its surface West car park. The zoo has decided to build housing on this. (A modest multi-storey car park there could have made up for the spaces lost elsewhere.) There is anyway still significant on-road parking in the streets around the zoo and on the Downs.
- 3) In 2019, before COVID struck, the zoo published a strategy to develop the Wild Place

as its main site and to keep the Clifton site as a local attraction. Parking for the Clifton site was not seen as a problem.

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

IV. The constraints on the use of the Downs north of the zoo – and the potential of the land - need clarification. All the land between the zoo's north boundary and the main road, including the land outside the zoo's main entrance, is part of Clifton Down. Under the 1861 Downs Act, this land must be used for the public resort and recreation of Bristolians. It is also common land, to which there is a right of access on foot. The pedestrian route along the zoo boundary wall probably qualifies as a public right of way through long use. The recreational value of this land should be maximised. The creation of a grand entrance to the proposed conservation hub and the retention of a large car park (that could only be used by visitors to the Downs) would not achieve this. The construction of large buildings on the boundary of the land would reduce the recreational value of this part of the Downs.

Detail

I Public access to the zoo grounds

1.1 The significance of the gardens is eloquently described at para 4.31 (page 75) of the heritage statement. The zoo's proposals will significantly reduce the attractiveness of the gardens. The proposed public access would be some compensation: the gardens would complement the recreational uses of the Downs well.

1.2 Public access cannot be secured in perpetuity by planning conditions or s106 agreements: residents would be able to apply to have conditions amended or removed to increase their privacy and security.

1.3 Other ways of securing public access include:

- Restrictive covenants. Better but still inadequate. Assuming that it retains an interest in the land through ownership of the site of the proposed conservation hub, the zoo could sell the site with a restrictive covenant requiring public access. The weakness is that the zoo could agree to the covenant being removed at a later date, or an application could be made to the courts for the covenant to be removed.
- Rights of way. Much stronger. For linear routes only. The zoo and Bristol City Council, as the local highway authority, could make creation agreements to establish footpaths on the site (see <https://www.ramblers.org.uk/advice/paths-in-england-and-wales/changes-to-the-pathnetwork/creating-a-right-of-way.aspx>). Once established, rights of way are hard to remove. .
- Right of access to all the site. Just as strong and would cover the lawns etc as well. Under section 16 of the Countryside and Rights of Way Act 2000, owners of land can dedicate it for public access in perpetuity. This is binding on subsequent owners.
- Designation as a town or village green. Also strongly protective. There are plenty of precedents in Bristol, including Canynge Square and the Mall Gardens in Clifton. The zoo can apply for voluntary registration under the Commons Act 2006. (See <https://www.oss.org.uk/what-do-wefight-for/village-greens-voluntary-registrationdedication-of-land-as-a-town-or-village-green-ofland-as-a-town-or-village-green/>).

1.4 The application proposes that the costs of maintaining the grounds should fall on residents. This will not guarantee the current high standards. The zoo needs to establish an endowment fund

of, say, £5million to achieve this.

II Parking history

(1) Past parking constraints

2.1 The documents submitted by the zoo rest heavily on assertions about the zoo's decline, quoted below from the planning statement. The same assertions are repeated in that statement at para 6.12 and in the design and access statement (page 10) :

" 1.3. Since the Zoo's peak in the 1960s, when approximately 1 million people visited the site each year, visitor numbers have decreased significantly to approximately 500,000 (precovid). This has resulted in the Society making a loss in recent years.

1.4. The primary reasons for this decline are the constrained scale of the site, which limits the Society's (the applicant's) ability to appropriately meet animals' needs, and the loss of parking provision serving the Zoo. "

2.2 This statement is not consistent with the zoo's last two applications for planning permission to park on the Downs; its reports on parking to the Downs Committee; or its annual accounts at <https://bristolzoo.org.uk/zoo-information/about-us/accounts-reviews-and-plans>.

2.3 We deal with the fall in visitor numbers and the zoo's finances more fully in the next section. On parking, the zoo has never claimed in its planning applications or reports to the Downs Committee that visitor numbers have decreased because of lack of parking provision. It has instead successfully argued for special concessions – such as five-hour parking on the roads on the Downs and near the zoo – and made unsubstantiated claims that its viability would be threatened if it were no longer allowed to use the Downs off Ladies Mile as its main car park. The zoo caused traffic chaos for many years by making no attempt to limit visitor numbers in line with the parking available. It even made a half price Groupon offer in 2015 that brought northwest Bristol to a halt.

2.4 In its annual reports to the Downs Committee, the zoo emphasised that it could easily manage with the (steadily reducing) parking provision planning committees allowed on the Ladies Mile site. Because of COVID, the site has not been used since 2019. The zoo's report to the Downs Committee for that year is attached. It notes that:

"During 2019, Bristol Zoo Gardens used the designated area of land off Ladies Mile for car parking on 22 days during the Easter school holidays, May bank holiday and Summer school holidays.

A total of 3,499 cars were parked, an average of 159 per day. As in previous years, the number of days used is comfortably within the days permitted. Parking was used on 4 fewer days than in 2018 and 509 fewer cars in total. "

2.5 The zoo's annual reviews and accounts from 2011 onwards do not attribute changes in visitor numbers to parking constraints. The annual accounts from 2013 onwards do, however identify pressure on parking as one of the principal future risks facing the zoo. The 2013 accounts were published in July 2014. Possibly coincidentally, one of DfP's members, a qualified accountant, had pointed out a year earlier that, if the financial viability of the zoo were considered materially dependent upon the Ladies Mile car park (as the zoo claimed in support of its planning application), this would have been identified as a risk in its audited annual financial statements. At that time it was not.

(2) Consequences of High Court challenge

2.6 Downs for People successfully challenged the grant of a twenty-year licence to the zoo to continue to park on the Downs off Ladies Mile. This led to a court order last year that established no part of the Downs could in future be set aside for parking for activities that were not on the Downs. The order allowed the Ladies Mile site to continue in use until October 2022 and the zoo's North car park until the end of 2023.

2.7 The zoo's planning statement gives an inaccurate impression of the consequences. It says:

“ 6.14 Regarding parking, the loss of facilities that the Zoo has historically relied upon, are well documented. The parking on the Downs and* off Ladies Mile, has reduced in recent years in accordance with the planning permissions granted. This left the Zoo primarily reliant on the North Car Park. However, this site sits on Downs land, and a recent High Court legal ruling has confirmed that use of both the North Car Park and Ladies Mile will be lost to the Zoo from 2024. In total, there are 340 spaces in the North Car Park and West Car Park, and 600 temporary spaces at Ladies Mile

6.15 As a result, from 2024 Bristol Zoo Gardens will have no car parking spaces available (on-street parking in the form of pay and display and the use of 36 parking permits only), which is insufficient to run a viable visitor attraction, irrespective of recent financial pressures”

*the ‘and’ is presumably a typing error. There is just one site on the Downs, off Ladies Mile.

2.8. This is misleading: it underestimates the past and present parking available to the zoo. Further, it does not mention that the zoo has decided to sell its west car park, the only parking provision on its own land. The parking available to the zoo is:

- North car park. Taken from the Downs over decades. 180 spaces. Parking for non-Downs activities must end by 31 December 2023.
- West car park. Opened in 2002. 160 spaces. Zoo is selling site for housing.
- Downs off Ladies Mile. Area with space for 660 cars licensed since 1960s. Use grew, with the zoo seeking permission for 102 days in 1996 and often using more than the space allowed. Planning committees gradually reduced the annual allowance to 30 days in 2019. Zoo repeatedly promised to make arrangements that would end its use of the site. Parking for non-Downs activities must end by 1 October 2022.
- Parking on neighbouring roads. When a Residents’ Parking Scheme was introduced in 2015, the zoo successfully lobbied for a five-hour limit (the length of an average zoo visit) in these roads, rather than the three hours originally proposed. There are 330 metered spaces. At weekends and Bank Holidays, parking is free of charge both in these spaces and in the rest of the area covered by the Residents’ Parking Scheme.
- Parking on roads on the Downs. When the council introduced parking restrictions on the roads on the Downs in 2016, the zoo pressed successfully for the parking limit to be set at five hours instead of the four originally proposed, with no restrictions on Bank Holidays. There are 1550 spaces on the roads on the Downs.

2.9. The most obvious way for the zoo to deal with the loss of the North car park and the Ladies Mile site would have been to build a multi-storey West car park. It anyway has continuing access to 330 metered spaces and 1500 free spaces on weekdays and 1830 spaces at weekends. Further, it has repeatedly committed itself to reducing the need for parking but has done little about it. It has benefited from significantly improved local bus and train services but resisted introducing a park-and-ride service itself. More time has been spent drawing up travel plans than in implementing effective measures.

III Pre-COVID plans

2.10 The suggestion that lack of parking required the closure of the Clifton site is at odds with the strategy Saving Wildlife Together, which the zoo published in June 2019 (attached). This saw Wild Place developing further in the years to 2025 as a “global wildlife adventure”; meanwhile the Clifton site would become an exciting “animal discovery centre”, appealing to a more local visitor base. There were plans for significant capital investment at the Clifton site, not closure. There was no mention of parking problems. There was only recognition that transport should be an enabler, not a blocker, and that alternatives to car travel were needed (p16).

III Visitor numbers and financial difficulties

3.1 The zoo's annual reviews/accounts and its statements in support of its planning applications, do not support the assertion quoted in para 2.1 above that the zoo has made losses in recent years because visitor numbers have decreased to about 500,000. The decrease is attributed to the constrained scale of the site limiting the zoo's ability to meet animal needs, as well as parking problems, but this is nowhere mentioned elsewhere.

3.2 The table below shows the visitor numbers given in the annual accounts, the increase/decrease from the previous year, and the explanation given for this.

Year	Visitors	% change	Reason given
2010	523000		
2011	579 613	+ 10.8	Fine weather and painted gorillas.
2012	589,552	+1.7	Animatronic DinoZoo
2013	554,494	- 5.9	Not clear. (More admission income though, from higher prices).
2014	528,036	-4.8	No DinoZoo.
2015	545,722	+3.3	Groupon promotion
2016	562,192	+3.0	Baby gorilla Afia
2017	523,166	-6.9	No baby gorilla
2018	*512,920	- 2.0	
2019	512,934	0.0	
2020	217,768	- 58	COVID
2021	313,146	+44	COVID

* Originally recorded as 478,126, a drop of 8.6%. Corrected the next year.

3.3 While visitor numbers may be lower than in the 1960s, they were clearly steady for a long period. The foreword to the 2011 annual review referred to "strong visitor numbers". In 2012 the zoo enjoyed "the best visitor numbers for over ten years". When submitting its last planning application in 2016, the zoo declared that it was 'flourishing'.

3.4 It is hard to detect any lasting financial problems in the zoo's annual accounts. The 'net movements in funds' ie gains/losses for the Bristol Zoological Society as a whole have been:

2011 - £167k
 2012 + £962k
 2013 + £3.493m
 2014 - £306k
 2015 + £785k
 2016 - £505k
 2017 + £1.587m
 2018 +£1.292m
 2019 + £1.9m
 2020 - £955k
 2021 - £387k.

In the years immediately before COVID, the Society's finances look very healthy.

3.5 When announcing closure of the Clifton site in November 2020, the zoo said that it had suffered operating losses in four of the last six years and declining visitor numbers. As shown above, both these statements are questionable. It also said: "The impact of Covid-19 has caused us to radically rethink our plans about the future and how we address the fundamental and persistent challenges that we face in order to save Bristol Zoological Society." In its 2020 accounts, the zoo again blames

COVID for its abandoning the 2019 strategy which would have kept the Clifton site (para 2,10 above). But the zoo's accounts show – and the figures in para 3.4 confirm – that the zoo has been to a large extent protected from the impact of the pandemic by a £2.5 million payout from its insurers, as well as by the Government support available to furlough staff etc.

3.6 There seems no compelling financial reason to close the Clifton site other than to make money to develop Wild Place. Sale of the site was not thought necessary in 2019: it is not clear why it is now.

IV Constraints on the land north of the zoo boundary

4.1 The land between the wall marking the zoo's northern boundary and the main road, currently occupied by the zoo's North car park and the approach to its main entrance, is subject to a number of constraints. The planning application recognises this but does not always express the constraints correctly. These are:

- Part of Clifton Down. The land is all part of Clifton Down, which is owned by the Society of Merchant Venturers (SMV) and subject to the Clifton and Durdham Downs (Bristol) Act 1861. It is the Downs Act and not SMV ownership that prevents use of this land other than for “the public resort and recreation of the citizens and inhabitants of Bristol”. It cannot be built on. The land does not have to be used as a car park: if it is, only Downs users will be able to park there from 2024. This was spelt out in the court order that brought our High Court challenge to an end. Anyone who ignores the order will be in contempt of court. Equally the land does not have to be restored to grassland as the heritage statement suggests (fig 101). It cannot be used as a grand entrance to the new conservation hub (fig 104) unless this is somehow of benefit to Downs users
- Common land. This has been common land “from time immemorial” (1861 Downs Act). This limits what can be done without specific permission from Defra's Secretary of State. It also means there is a statutory right of access on foot.
- Right of way. The planning application points out (page 130 of Heritage Statement) that there is an ‘unofficial’ pedestrian route along the zoo's boundary wall. This is the route the road followed, probably until 1828. This route would almost certainly qualify as a public right of way, certainly for pedestrians and possibly for cyclists and even cars. If designated as a right of way, the route will need to be left unobstructed, or changed by legal action.

4.2. The Downs Committee is currently considering the use of this land. Downs for People is pressing for it to be used in a way that adds most recreational value. It could create a walking route to rival the Promenade and use the open space for a variety of activities. Development within the zoo site, particularly along the north boundary wall, will impact on this site and on those walking to it from the higher parts of the Downs. The current proposed height and bulk of the buildings will produce some overshadowing and overlooking.

Downs for People

18 August 2022

Flood Risk Manager

Date: 28th July 2022

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

controls such as filtration devices put in place to help prevent this though. A maintenance schedule with routine checks would also help enable this.

Suggested condition: B35A Sustainable Drainage System (SuDS) NB: Add relevant advice I058

No development shall take place until a Sustainable Drainage Strategy and associated detailed design, management and maintenance plan of surface water drainage for the site using SuDS methods has been submitted to and approved in writing by the Local Planning Authority. The approved drainage system shall be implemented in accordance with the approved Sustainable Drainage Strategy prior to the use of the building commencing and maintained thereafter for the lifetime of the development. Reason: To prevent the increased risk of flooding by ensuring the provision of a satisfactory means of surface water disposal is incorporated into the design and the build and that the principles of sustainable drainage are incorporated into this proposal and maintained for the lifetime of the proposal

Economic Development

Date: 28th September 2022

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

Date: 13th December 2022

The superseded Economic Benefits Assessment document represents a reasonable estimate of the potential economic benefits of the proposal.

Highways England (also referred to as National Highways)

Date: 11th November 2022

22/02737/F - Redevelopment of site to include 196 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings at Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA Thank you for consulting National Highways on proposed revisions to the above application, the site of which is located approximately 5.5km south east of M5 Junction 18/18A, 7.2km south west of M5 Junction 17 and 2km west of M32 Junction 3. National Highways was previously consulted on application 22/02737/F in June 2022 and offered no objections as set out in our attached response dated 8 July 2022. The amendments generally comprise a reduction in dwellings from 201 to 196, and changes to building designs, materials and pedestrian accesses. National Highways is satisfied these revisions are unlikely to result in an adverse impact on the safe operation of the strategic road network and as such continue to recommend no objections to application 22/02737/F as AMENDED. Kind regards, Planning Manager (Highways Development Management), Operations National Highways | Ash House | Falcon Road | Sowton Ind. Estate | Exeter | EX2 7L

Historic Buildings And Places

Date: 27th July 2022

FAO: Case Officer

Address: Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA

Application Ref: 22/02889/LA

Proposal: Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure. Works to listed building including: access-works to the Guthrie Road entrance gates; the conversion of the Entrance Lodge to facilitate community floorspace, the residential conversion of the Giraffe House, and various restoration and refurbishment works to the Aquarium (former Bear Pit), Monkey Temple, and Birds of Prey Aviary to secure their future as part of accessible landscaped gardens.

Statutory Remit: Historic Buildings & Places (HB&P) is the working name of the Ancient Monuments Society, a registered charity in England and Wales (no. 209605). We are a consultee on all Listed Building Consent applications involving an element of demolition, as required by the Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.

Comments: Thank you for consulting HB&P on this application. I apologise for the delay in responding. While the departure of the Zoo from this site will harm the overall historic and communal value of the Gardens, HB&P acknowledges that an element of residential development is acceptable to secure the future of the site. However, we do have concerns with some aspects of the application.

We welcome the proposals to retain the ‘parkland’ setting around the central lake as well as the removal of later unsympathetic accretions to the designated and local heritage assets, and their refurbishment as parkland follies and dwellings.

We agree that the location of the new apartment buildings is best located to the perimeter of the site, as proposed, however, their height and scale is excessive and harmful to the setting of the listed Zoo buildings and to the character of the conservation area. The existing buildings to be demolished are small scale and of different heights with spaces between each building, whereas the proposed buildings present a solid built form extending along each frontage, with little permeability beyond the formal entrances. The design and massing of these new buildings, particularly those on Guthrie Street opposite the listed Clifton College buildings, don’t appear to fit well within the streetscapes of the conservation area, and at up to 6 stories, are too tall for the area. While not a listed building, the Art Deco clock building contributes to the story and development of the zoo over time. The roof extension is clumsy and doesn’t respect the elongated proportions of the building, harming its appearance. Retaining it in its existing form would be preferable, and would provide a needed gap between the taller new buildings to either side.

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

Relevant NPPF (2021) policy considerations are:

- Paragraph 195: “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take

this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal".

- Paragraph 199: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation".
- Paragraph 200: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification."

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

Regards

Ross Anthony

Historic England 1 of 3

Date: 29th June 2022

Arrangements for Handling Heritage Applications Direction 2021 & T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990
BRISTOL ZOO GARDENS GUTHRIE ROAD BRISTOL BS8 3HA
Application Nos 22/02889/LA & 22/02737/F

Thank you for your letters of 14 June 2022 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Summary

Generally, Historic England finds much to admire in the proposed development, which we feel on the whole is a sensitive response to its historic context. However, a considerable aspect of the site's significance is bound up in its continued use as a Zoo since the early 19th century, and its closure will have a pronounced harmful impact on the significance of the site.

The loss of the Zoo from the site is partially mitigated through good design, retention of much of the historic planting and landscape, and allowances made for future public access. There are some heritage benefits to the proposals, especially the removal of later accretions to the listed structures, and the restoration of those buildings.

There is room for improving the proposed design of the alterations to the art-deco café and the proposed building facing Guthrie Road, in order to preserve and enhance the character and appearance of the surrounding conservation area. We recommend you request revisions to these discrete aspects of the proposals prior to determination of the application.

While not directly related to this application, we note the recent Court Order quashing Planning Permission for residential development on the Zoo's West Car Park, outside the boundary of this application. We encourage your authority to consider how development proposals for the College Road site might be brought forward in conjunction with these plans.

Significance

Bristol Zoological Gardens are the earliest provincial Zoo in England, having opened in 1836. The gardens, a locally-designated historic park, have been continually upgraded and adapted since opening, although the original design principles - a long terrace walk at the North side of the site, a large water feature in the centre, and exhibits in contained areas around the site perimeter - remain legible. The site is of considerable heritage significance.

The site is within the Clifton and Hotwells Conservation Area, and contains a number of Grade II listed buildings, some listed very recently following a review of the site by my colleagues in our listing team. The entrance lodges, south gate, and former giraffe house have long been listed. The bear pit, monkey temple and birds of prey aviary have recently also been listed at Grade II. There are a number of unlisted structures which make a positive contribution to the character and appearance of the conservation area, including the central pavilion, the forest of birds, the art-deco tearoom and the Clifton pavilion.

A great part of the Zoo site's significance is in its communal value; the meaning of the place for the people who relate to it, or for whom it figures in their collective experience or memory. These values are to a degree associated with the attractive landscaped environment of the zoo but are perhaps more associated with the activity of the place, than its physical fabric.

There is, however, considerable aesthetic and historic value in the Zoo and its environs. It is an attractive garden landscape, the original early 19th century layout of which is still discernible. The high boundary walls, diverse architecture and lush, verdant character of the planting make for a site of insular character that is markedly different from the surrounding upmarket suburbs of Clifton.

Impact

In considering proposals for the redevelopment of the site, the great challenge is how the character of the site could be preserved and enhanced once its *raison d'être* - the animals - have departed.

The Zoo would close, and its operations would transfer to the existing satellite operation of Bristol Zoo at the Wild Place, near Cribbs Causeway. The entire site would be repurposed as a new residential enclave, with the majority of the existing gardens retained and provision made for public access. The Zoo would retain a small education offering on the site in the existing gatelodges and reception building, which would be repurposed as the "Clifton Conservation hub".

A series of residential buildings would be constructed around the perimeter of the site, mainly in areas presently occupied by animal enclosures. We are encouraged by the approach taken to the design of these proposed buildings. They are simple in form, but carefully modulated to avoid large unrelieved elevations. Their proposed elevations strike a balance between preserving the inward-looking, walled character of the Zoo site, and providing visual interest and engagement with the surrounding streets.

The proposed buildings would be built of buff brick with deep punched openings, and a rusticated feel at lower levels referencing the existing random rubble perimeter walls. At upper levels a smoother texture would be used. Planting would be designed into the buildings to soften their appearance and acknowledge the green character of the site and the Downs, opposite. Playful decorative motifs - animal imagery in tiled motifs and fret-cut metalwork - would be applied to reference the site's previous use.

The scale and massing of the proposed new buildings is generally an appropriate response to the historic context. They would not significantly exceed the height set by the established surrounding townscape. The proposed apartment block facing Guthrie Road differs from the rest of the new-build accommodation in that it will have a frontage that addresses the surrounding roads. It is opposite the Grade II* listed Clifton College buildings, and there needs to be a balance between a building which is clearly part of the family of new buildings but also integrates with the surroundings. This building would benefit from further refinement to break its massing and perhaps to better reference the characteristic defined bay rhythms of the surrounding buildings.

A series of new-build houses would be constructed around the southern edge of the lake, and adjacent to the forest of birds. In contrast to the subtle design of the perimeter blocks, these would be of a more flamboyant aesthetic with steeply-pitched roofs, eye-catching materials, and feature large windows which draw upon the large openings of the listed former giraffe house for architectural reference. The energetic architecture of the proposed new-build houses is, in our view, an appropriate response to the 'otherworldly' character of the Zoo site.

Existing buildings within the site would be converted, where possible, to residential use. The existing central pavilion/former museum would be sensitively adapted, with modern accretions removed. A similarly sensitive restoration and conversion would be undertaken at the Forest of Birds and the Clifton pavilion and we endorse this approach, which will preserve the historic buildings and provide them with a beneficial use.

It is proposed to adapt and extend the art-deco cafeteria building, removing its rather sprawling later 20th century extensions but adding a two-storey rooftop extension. We feel the proposed two-storey rooftop extension would rather overwhelm the architecture of the existing building and recommend that this element of the design is revised. A single-storey upward extension here is likely to allow the aesthetic of the existing building to remain uncompromised, whereas the present proposal for two additional storeys would, we feel, have a harmful impact.

Unsympathetic extensions would be removed from the listed former bearpit, and it would act as a viewing platform for site visitors. The listed birds of prey aviary would be adapted as a seating area. The monkey temple would be restored and continue to act as an attractive landscape folly. We are pleased to support these aspects of the proposals.

We regret the need for vehicles to enter the site post-redevelopment. Part of the site's character is derived from its traffic-free environs, and the movement of vehicles and surface car parking will be a detracting influence. While the majority of car parking is accommodated in undercroft areas and car ports, a small number of surface car parking areas are proposed. Great care will be needed in the design of shared-surface streets to prevent ad-hoc parking of vehicles and ensure the ability of pedestrians to promenade around the site is undiminished.

The ability for visitors to enter the site, free of charge, post-redevelopment, is a significant heritage benefit. We understand that maintenance of the gardens will be funded through a service charge on new residents; a necessary feature given the high-maintenance nature of the Zoo landscaping. We would expect your authority to secure this public access through legal agreement, should you be minded to recommend approval of this planning application.

It is important that users of the gardens and new residents are able to understand and interpret the history of the site. Details of an interpretation strategy should be the subject of a planning condition on

any approval. We would encourage an imaginative response to the interpretation of the site in discussion with other partners and stakeholders.

Policy

The closure of the Zoo will cause some harm to the character and appearance of the Clifton and Hotwells Conservation Area. That harm is less than substantial, but you should not immediately proceed to the “balancing exercise” of weighing benefits versus harm.

The National Planning Policy Framework (NPPF) is very clear on this. Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation, irrespective of whether any potential harm amounts to substantial harm, or less than substantial harm to its significance. Paragraph 200 goes on to advise that any harm to the significance of a designated heritage asset should require clear and convincing justification.

In other words, if there is a means by which the benefits of the scheme can be realised while lessening the harm to the historic environment (or potentially avoiding harm altogether), the justification is not clear and convincing.

We consider that relatively minor design changes are needed to the café extension and the Guthrie Road building. If these amendments were secured, we may be in a position to acknowledge that the harm has been minimised as far as possible, which could then allow you to proceed to the balancing exercise set out under NPPF paragraph 202.

NPPF paragraph 206 is also of relevance to these proposals, stating that “Local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

While the impact of the Zoo closure on the conservation area is harmful, we consider that the detailed proposals for the individual heritage assets within the Zoo site will enhance, and better reveal, their significance. With the minor adjustments to the scheme as suggested above, the scheme has the potential to comply with NPPF paragraph 206.

Position

Revisions to the design of the café extension and the Guthrie Road building could allow Historic England to support these proposals. We are not in that position yet, however, and have some concerns over the impact of the proposals on the character and appearance of the Clifton and Hotwells Conservation Area. We understand the Zoo’s intention to secure planning permission and sell their site with an extant consent. Our potential support is based upon the development being executed in accordance with the presented vision, and the possibility of a later exercise in value engineering should be avoided at all costs.

Recommendation

Historic England has concerns regarding the applications on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 199, 200 and 206 of the NPPF.

Yours sincerely

Simon Hickman
Principal Inspector of Historic Buildings and Areas

Historic England 2 of 3

Date: 24th November 2022

Arrangements for Handling Heritage Applications Direction 2021 & T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990
BRISTOL ZOO GARDENS GUTHRIE ROAD BRISTOL BS8 3HA Application Nos 22/02889/LA & 22/02737/F

Thank you for consulting Historic England on amendments to the listed building consent and planning applications to redevelop the site of Bristol Zoo, Clifton, for residential purposes. On the basis of this information, we offer the following advice to assist your authority in determining the applications.

Our previous advice We wrote to you on 14 June 2022 in response to the original submissions. We advised that while we generally found the proposals to be a sensitive response to their historic context, a considerable aspect of the site's significance is bound up in its continued use as a Zoo since the early 19th century. The closure will have a pronounced harmful impact on the significance of the site. We advised that the loss of the Zoo from the site is partially mitigated through good design, retention of much of the historic planting and landscape, and allowances made for future public access. There are some heritage benefits to the proposals, especially the removal of later accretions to the listed structures, and the restoration of those buildings. We advised that there was room for improving the proposed design of the upward extension to the clock tower building and the façade of the proposed building facing Guthrie Road, in order to preserve and enhance the character and appearance of the surrounding conservation area. These amendments respond to those comments.

The amended proposals

The amended proposals for the clock tower building would see the proposed rooftop extension reduced from two storeys to one. We felt the previous proposals for a twostorey rooftop extension would overwhelm the architecture of the existing building beneath. The revised proposed for a single-storey upward extension now allows the aesthetic of the existing building to remain uncompromised and addresses our previous concerns.

We expressed reservations about the design of the proposed building fronting Guthrie Road in our previous advice. This building will have a frontage that addresses the surrounding roads. It is opposite the Grade II* listed Clifton College buildings. We suggested that this building would benefit from further refinement to break its massing better reference the characteristic bay rhythms of the surrounding buildings.

In response to our comments, the design of the proposed Guthrie Road building has been revised. A defined bay rhythm has been introduced to the Guthrie Road elevation of the proposed building, which in our view successfully references the character of surrounding properties. We feel the revised proposals address the need to strike a balance between a building which is clearly part of the family of new buildings on the Zoo site, but also integrates with the conservation area context of surrounding streets.

The proposed building fronting the Northern boundary of the site has been revised in elevation. We did not make detailed comments on this building in our previous advice and do not propose to here, other

than to record that the proposed amendments are an improvement when compared against the previous scheme.

In response to comments raised by other stakeholders, it is now proposed to make adjustments to the boundary wall at the North East corner of the site to encourage public access and increase visual permeability. While we have previously advised that the inward-looking character of the site with its solid perimeter wall is an important aspect of its character, we understand the desire to make the site more permeable. We feel the revised proposals balance the preservation of a walled perimeter with the desire to invite users to enter the site, and do not oppose these revised proposals.

The planning balance

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

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

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

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

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

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

Recommendation

Historic England has no objection to the applications on heritage grounds. Your authority should take these representations into account in determining the applications. If there are any material changes to the proposals, or you would like further advice, please contact us.

Please advise us of the decision in due course. Yours sincerely Simon Hickman Principal Inspector of Historic Buildings and Areas

Historic England 3 of 3

Date: 1st February 2023

Thank you for your letter of 17 January 2023 regarding further information on the above application for planning permission. The additional information on which you have consulted us consists of additional justification for the proposals, mainly in response to comments made by other interested parties. There are also minor amendments to blocks E1, E2, and E3, in order to address concerns about overlooking. The additional information and minor amendments have no material bearing on the advice which we have previously given. I therefore refer you to our previous letter of 23 November 2022 (our reference L01508753), the comments of which still stand.

Yours sincerely Simon Hickman Principal Inspector of Historic Buildings and Areas

Housing Enabling Team 1 of 3

Date: 15th July 2022

Affordable Housing Requirement

The Council's planning policies for affordable housing in Bristol are set out in Policy BCS17: Affordable Housing Provision in the Core Strategy Local Plan (Adopted June 2011), and Policy DM3: Affordable Housing Provision: Smaller Sites in the Site Allocations and Development Management Policies Local Plan (Adopted July 2014). Further guidance on the Council's affordable housing policies is set out in the Affordable Housing Practice Note 2018 (AHPN). The site falls within Clifton ward, which is in Inner West Bristol. In accordance with policy BCS17 the site is required to deliver 40% affordable housing, which is 80.4 units out of the 201 units being delivered. However, the site is eligible to make use of the 'Threshold' approach to BCS17 added by the AHPN that applies to the Inner East and West areas. This would require the site to deliver a minimum of 20% affordable housing providing the applicant agrees to certain criteria. In order to take this 'Fast Track' route the applicant will agree to:

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

The applicant has suggested that they will take this option and offered 41 units as affordable housing which is compliant with policy.

Tenure

The current tenure requirement is 75% Social Rent and 25% Affordable Homeownership products. The applicant has delivered on this tenure split in their present proposal. As the application stands there is a proposed 11 First Homes and 30 Social Rent units. This is acceptable and a compliant application in terms of tenure however, given the property values in the area and the national policy requirement that First Homes after discount shall not exceed £250,000 it would be the Strategy and Enabling Team's preference to have these amended to shared ownership units as we believe this will make these units more affordable to more people. If this was something the applicant would consider it would be most welcome, albeit not essential to be policy compliant. The Affordable Housing Statement submitted with the planning application does not include proposed sale values for each house type/ size which would be helpful to understand the affordability of these units and give a clearer steer of how any affordable homeownership units may work on the site. Unit size and type It is expected that the affordable housing contribution will address identified housing needs and reflect the proportions of property types and sizes in the overall scheme and contribute to balanced and sustainable communities in Bristol. The current application does not address need in this way. There is little affordable housing in Clifton ward and while this contribution is welcomed, the current proposal does not reflect the property types and sizes across

the scheme at present, or the affordable housing need as set out in the Local Housing Needs Assessment for Bristol. The applicant has proposed 30 1-bed units and 11 2-bed units across the affordable tenures. This will not meet family accommodation need in the area and as a consequence, we do not feel it acceptable. What affordable housing is already available in Clifton is already predominantly 1 and 2- bed flats and we would like to see this development contribute to a greater mix in unit sizes. Were the application to reflect proportionately the needs of Bristol and the area's particular need for family housing we would propose the development offers a size mix as illustrated below: Size Number 1bed 13 2bed 12 3bed 12 4bed 4 Whilst the Strategy and Enabling team understand that viability may make this precise split not feasible, we would like to see the applicant offer a greater mix of property sizes, including some 3 or 4- bed houses. This would broaden the range of affordable housing on offer in the area and support the reduction of wait times which are generally far longer for larger properties. As the plans are at present there is also one First Home unit among the social rented units which we would advise against. This would make management of the block more complex and a challenge for any Registered Provider (RP) who were to take on these properties as it would add an extra leaseholder to the mix. This is particularly challenging if the scheme were to stay with First Home provision as these are not expected to be managed by an RP but sold directly to eligible people. This issue may fall away if the applicant amends their affordable units to reflect our proposed mix as mentioned above. We welcome and can confirm the applicants present application does meet Nationally Described Space Standards across the affordable units. There is a high demand in the City for affordable housing for people with disabilities. The 2018 Urban Living SPD recommends that 90 per cent of new build housing meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation M4(3) 'wheelchair user dwellings. Whilst the applicant has not reached the Urban Living SPD recommendations for accessible dwellings, they have met Policy DM4 which requires 2% of new housing with over 50 units to be designed as wheelchair user dwellings. We note that two of the M4(3) units are on the first and second floor, we would like to see confirmation that the pathway to these flats is fully accessible for a wheelchair. This should include automatic doors throughout the pathway from the entrance of the block to the front doors of the M4(3) flats. We would also like these plans to be reviewed by our Accessible Homes Team to confirm that the dwellings will meet a lettable standard to a wheelchair user. Under the present proposal, one of the 4 proposed M4(3) units is for private sale. Unless the applicant is actively intending to market to someone with adaptable needs, we'd recommend this is amended to become an affordable housing unit where we are confident we would be able to find someone who requires an accessible home.

Car Parking

At present it appears that the only parking offered for the affordable housing is for the accessible units. It is understood that given the central location of the site and the good transport links that the applicant is pushing to reduce cars on this site however, we would ask that a reasonable proportion of the parking spaces on site are made available to affordable housing tenants who are car users. This could perhaps be done on an application or permit basis. We would ask that the accessible housing parking spaces are secured via the Section 106 agreement to the units they are allocated to.

Distribution of units:

The council seeks fully integrated mixed tenure housing schemes and will support a reasonable level of clustering, particularly for any proposed flatted units, to enable small self-contained blocks. The location of the units is to be agreed with the Strategy and Enabling Team. Buildings should be designed to be tenure blind.

Approved Housing Provider

The developer is expected to provide affordable homes on site without any public subsidy. The affordable units should be transferred to a Registered Provider who is a member of the Homes West partnership. Rents & Service Charges Rents for Social Rented units should be set according to the relevant government formula, further information is here. The service charge is the amount payable on an affordable housing unit in addition to the rent/mortgage due. It should include all estate management charges, ground rents, services, repairs, regular maintenance items such as cleaning and grounds keeping, and the insurance of the building. Sinking funds may be charged additionally to service charges. Sinking Charges should only be set to recover the replacement costs of items or areas of the building at their expected end of 'life' as part of programmed repairs for the building. To ensure the relative affordability of units, total service charge costs should not exceed £650 for an affordable unit. This figure is benchmarked to 2018 and can be inflated by CPI annually. The total costs of rent + service charges for all affordable units must not exceed the current Local housing Allowance rates, this may mean that the services charges cannot be raised in certain years. Early consultation is recommended, as good design can overcome the need for high service charges. Where schemes are facing particular difficulties remaining within the cap, such as, but not limited to, needing additional requirements through the planning process, or delivering a complex site with additional costs, exemptions can be requested via the Strategy and Enabling team to raise the cap level. These will be reviewed on a case-by-case basis and should be requested at the earliest possible date in the development process. Developers/ development management companies must not make profit on service charges and can only charge costs that are reasonable to the services they deliver.

Enabling Fee:

An Enabling Fee will be payable when each affordable home is substantially completed. These fees are designed to maximise affordable housing delivery in the city by assisting registered providers with support on planning, property and highway issues. A fee of £550 per affordable home index linked from 1 October 2017 will apply. The fee is paid to the Council on substantial completion of each of the affordable homes and applies to Social Rent, Affordable Rent, Intermediate Rent and other Intermediate affordable housing tenures procured through s106 negotiations and delivered without public subsidy or through re-provision/remodelling, extra care housing and 100% affordable housing schemes

Housing Enabling Team 2 of 3

Affordable Housing Requirement

The Council's planning policies for affordable housing in Bristol are set out in Policy BCS17: Affordable Housing Provision in the Core Strategy Local Plan (Adopted June 2011), and Policy DM3: Affordable Housing Provision: Smaller Sites in the Site Allocations and Development Management Policies Local Plan (Adopted July 2014). Further guidance on the Council's affordable housing policies is set out in the Affordable Housing Practice Note 2018 (AHPN). The site falls within Clifton ward, which is in Inner West Bristol. In accordance with policy BCS17 the site is required to deliver 40% affordable housing, which is 80.4 units out of the 201 units being delivered. However, the site is eligible to make use of the 'Threshold' approach to BCS17 added by the AHPN that applies to the Inner East and West areas. This would require the site to deliver a minimum of 20% affordable housing providing the applicant agrees to certain criteria. In order to take this 'Fast Track' route the applicant will agree to:

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

The applicant has suggested that they will take this option and offered 41 units as affordable housing which is compliant with policy.

Tenure

The current tenure requirement is 75% Social Rent and 25% Affordable Homeownership products. The applicant has delivered on this tenure split in their present proposal. As the application stands there is a proposed 11 First Homes and 30 Social Rent units. This is acceptable and a compliant application in terms of tenure however, given the property values in the area and the national policy requirement that First Homes after discount shall not exceed £250,000 it would be the Strategy and Enabling Team's preference to have these amended to shared ownership units as we believe this will make these units more affordable to more people. If this was something the applicant would consider it would be Strategy & Enabling Planning Consultation Response: Bristol Zoological Gardens, College Road, Clifton, BS8 3HA Planning Application Number: 22/02737/F most welcome, albeit not essential to be policy compliant. The Affordable Housing Statement submitted with the planning application does not include proposed sale values for each house type/ size which would be helpful to understand the affordability of these units and give a clearer steer of how any affordable homeownership units may work on the site. Unit size and type It is expected that the affordable housing contribution will address identified housing needs and reflect the proportions of property types and sizes in the overall scheme and contribute to balanced and sustainable communities in Bristol. The current application does not address need in this way. There is little affordable housing in Clifton ward and while this contribution is welcomed, the current proposal does not reflect the property types and sizes across the scheme at present, or the affordable housing need as set out in the Local Housing Needs Assessment for Bristol. The applicant has proposed 30 1-bed units and 11 2-bed units across the affordable tenures. This will not meet family accommodation need in the area and as a consequence, we do not feel it acceptable. What affordable housing is already available in Clifton is already predominantly 1 and 2- bed flats and we would like to see this development contribute to a greater mix in unit sizes. Were the application to reflect proportionately the needs of Bristol and the area's particular need for family housing we would propose the development offers a size mix as illustrated below:

Size	Number
1bed	13
2bed	12
3bed	12
4bed	4

Whilst the Strategy and Enabling team understand that viability may make this precise split not feasible, we would like to see the applicant offer a greater mix of property sizes, including some 3 or 4- bed houses. This would broaden the range of affordable housing on offer in the area and support the reduction of wait times which are generally far longer for larger properties. As the plans are at present there is also one First Home unit among the social rented units which we would advise against. This would make management of the block more complex and a challenge for any Registered Provider (RP) who were to take on these properties as it would add an extra leaseholder to the mix. This is particularly challenging if the scheme were to stay with First Home provision as these are not expected to be managed by an RP but sold directly to eligible people. This issue may fall away if the applicant amends their affordable units to reflect our proposed mix as mentioned above. We welcome and can confirm the applicants present application does meet Nationally Described Space Standards across the affordable units. There is a high demand in the City for affordable housing for people with disabilities. The 2018 Urban Living SPD recommends that 90 per cent of new build housing meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation M4(3)

'wheelchair user dwellings. Whilst the applicant has not reached the Urban Living SPD recommendations for accessible dwellings, they have met Policy DM4 which requires 2% of new housing with over 50 units to be designed as wheelchair user dwellings. We note that two of the M4(3) units are on the first and second floor, we would like to see confirmation that the pathway to these flats is fully accessible for a wheelchair. This should include automatic doors throughout the pathway from the entrance of the block to the front doors of the M4(3) flats. We would also like these plans to be reviewed by our Accessible Homes Team to confirm that the dwellings will meet a lettable standard to a wheelchair user. Under the present proposal, one of the 4 proposed M4(3) units is for private sale. Unless the applicant is actively intending to market to someone with adaptable needs, we'd recommend this is amended to become an affordable housing unit where we are confident we would be able to find someone who requires an accessible home. Car Parking At present it appears that the only parking offered for the affordable housing is for the accessible units. It is understood that given the central location of the site and the good transport links that the applicant is pushing to reduce cars on this site however, we would ask that a reasonable proportion of the parking spaces on site are made available to affordable housing tenants who are car users. This could perhaps be done on an application or permit basis. We would ask that the accessible housing parking spaces are secured via the Section 106 agreement to the units they are allocated to. Distribution of units The council seeks fully integrated mixed tenure housing schemes and will support a reasonable level of clustering, particularly for any proposed flatted units, to enable small self contained blocks. The location of the units is to be agreed with the Strategy and Enabling Team. Buildings should be designed to be tenure blind. Approved Housing Provider The developer is expected to provide affordable homes on site without any public subsidy. The affordable units should be transferred to a Registered Provider who is a member of the Homes West partnership. Rents & Service Charges Rents for Social Rented units should be set according to the relevant government formula, further information is here. The service charge is the amount payable on an affordable housing unit in addition to the rent/mortgage due. It should include all estate management charges, ground rents, services, repairs, regular maintenance items such as cleaning and grounds keeping, and the insurance of the building. Sinking funds may be charged additionally to service charges. Sinking Charges should only be set to recover the replacement costs of items or areas of the building at their expected end of 'life' as part of programmed repairs for the building. To ensure the relative affordability of units, total service charge costs should not exceed £650 for an affordable unit. This figure is benchmarked to 2018 and can be inflated by CPI annually. The total costs of rent + service charges for all affordable units must not exceed the current Local housing Allowance rates, this may mean that the services charges cannot be raised in certain years. Early consultation is recommended, as good design can overcome the need for high service charges. Where schemes are facing particular difficulties remaining within the cap, such as, but not limited to, needing additional requirements through the planning process, or delivering a complex site with additional costs, exemptions can be requested via the Strategy and Enabling team to raise the cap level. These will be reviewed on a case-by-case basis and should be requested at the earliest possible date in the development process. Developers/ development management companies must not make profit on service charges and can only charge costs that are reasonable to the services they deliver.

Enabling Fee

An Enabling Fee will be payable when each affordable home is substantially completed. These fees are designed to maximise affordable housing delivery in the city by assisting registered providers with support on planning, property and highway issues. A fee of £550 per affordable home index linked from 1 October 2017 will apply. The fee is paid to the Council on substantial completion of each of the affordable homes and applies to Social Rent, Affordable Rent, Intermediate Rent and other Intermediate affordable housing tenures procured through s106 negotiations and delivered without public subsidy or through re-provision/remodelling, extra care housing and 100% affordable housing schemes

Bethany Albrecht

Housing Enabling Team 3 of 3

Date: 16th March 2023

Affordable Housing Requirement

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

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

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

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

Tenure

The applicant has currently offered the Council's requirement is 75% Social Rent and 25% 'First Homes' which is acceptable. Ordinarily we would wish to see a mix of property types, however to remain within the £250k cap on First Homes, due to house prices in the area, it is understood why 1 bedroom properties have been selected, to remain within the cap. As the application stands there is a proposed 10 First Homes which are located in Block E and 30 Social Rent units in Block S.

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

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

Unit size and type

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

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

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

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

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

Car Parking

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

Approved Housing Provider

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

Rents & Service Charges

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

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

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

Early consultation is recommended, as good design can overcome the need for high service charges. Where schemes are facing particular difficulties remaining within the cap, such as, but not limited to, needing additional requirements through the planning process, or delivering a complex site with additional costs, exemptions can be requested via the Strategy and Enabling team to raise the cap level. These will be reviewed on a case-by-case basis and should be requested at the earliest possible date in the development process. Developers/ development management companies must not make profit on service charges and can only charge costs that are reasonable to the services they deliver.

Enabling Fee

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

A fee of £570 per affordable home index linked from 1 October 2017 will apply. The fee is paid to the Council on substantial completion of each of the affordable homes and applies to Social Rent, Affordable Rent, Intermediate Rent and other Intermediate affordable housing tenures procured through s106 negotiations and delivered without public subsidy or through re-provision/remodelling, extra care housing and 100% affordable housing schemes.

Helen Chard

Land Contamination (BCC)

Date: 24th February 2023

The following report has been considered as part of the application: Card Geotechnics Limited (May 2022). Bristol Zoo Gardens, Geotechnical and Geo-environmental Interpretative Report. CGE/16703. Revision 2.

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

We do have the following comments but these can be addressed with future submissions rather than prior to determination. The report includes both desk study and intrusive investigation.

Desk study comments: A number of tanks were identified with contents unknown, including some bunded tanks on the Guthrie Road side of the site, have the tank uses been established since the initial DS/SI?

No mention is made of historical reports on the site, were any made available to the consultants for review?

Site investigation comments: The investigation is acceptable, the report is honest about the limitations of undertaking an assessment whilst the zoo was still operating and further assessment is recommended (samples taken were limited in number and distribution across the site).

Deviating samples for cyanide were noted in the logs but not discussed within the main text of the report.

Future work: We do suggest any future site investigation could zone the site accordingly to the land uses, especially given the large area of public open spaces, this could assist with materials

management ensuring more sustainable development and enhance the amount of soils suitable for reuse. It is recommended a revised radon risk assessment is undertaken given changes made by UK Radon in Autumn 2022. Given the high risk of unexploded ordnance a compliance condition is recommended to ensure any future intrusive investigation or groundworks comply with the advice.

The following conditions are recommended to be applied to any future consent. These can be worded to allow phased development if required.

Intrusive site investigation

A site specific risk assessment and intrusive investigation shall be carried out to assess the nature and extent of any site contamination and whether or not it originates from the site. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The results of this investigation shall be considered along with the reports submitted with the original application. The written report of the findings shall be submitted to an approved in writing by the Local Planning Authority prior to any works (except demolition) in connection with the development, hereby approved, commencing on site. This must be conducted in accordance with the Environment Agency's Land Contamination: risk management and BS 10175:2011 + A2:2017: Investigation of Potentially Contaminated Sites - Code of Practice.

Submission of Remediation Scheme

No development shall take place (except demolition) until a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment has been prepared, submitted to and approved in writing by the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Implementation of Approved Remediation Scheme

In the event that contamination is found, no occupation of the development shall take place until the approved remediation scheme has been carried out in accordance with its terms. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report (otherwise known as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced, and be approved in writing by the Local Planning Authority.

Reporting of Unexpected Contamination

In the event that contamination is found at any time that had not previously been identified when carrying out the approved development, it must be reported immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the Environment Agency's Land Contamination: risk management guidance and BS 10175:2011 + A2:2017: Investigation of Potentially Contaminated Sites - Code of Practice. Where remediation is necessary a remediation scheme must be prepared which ensures the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of

the remediation scheme works.

Reason (for all conditions) : To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

UXO Compliance Condition

The development hereby approved must be implemented in accordance with the mitigation measures outlined in the following report submitted by the applicants with the application: Appendix C, Preliminary and Detailed Unexploded Ordnance Risk Assessment, prepared by Alpha Associates within Card Geotechnics Limited (May 2022). Bristol Zoo Gardens, Geotechnical and Geoenvironmental Interpretative Report. CGE/16703. Revision 2.

Reason: To ensure that development can take place without unacceptable risk to workers and neighbours including any unacceptable major disruption to the wider public on and off site that may arise as a result of evacuation/s associated with the mitigation of UXO

Mall Gardens Residents Association

Date: 6th January 2023

Comments on behalf of Mall Gardens Residents Association:

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

National Highways

Date: 11th July 2022

Referring to the notification of a planning application referenced above, for the redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings, at Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA, notice is hereby given that National Highways' formal recommendation is that we:

- a) offer no objection (see reasons at Annex A);
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence. Where relevant, further information will be provided within Annex A.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

Signature: Sally Parish

Annex A National Highways recommended No Objections

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England was renamed National Highways in August 2021. Prior to April 2015 the organisation was known as the Highways Agency. National Highways is a government owned company responsible for operating, maintaining and improving the SRN.

Statement of Reasons

The application seeks full permission for the redevelopment of the Bristol Zoo Gardens site (BZG) to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings, at, Guthrie Road, Bristol. The 4.6ha site is located approximately 5.5km south east of M5 Junction 18/18A, 7.2km south west of M5 Junction 17 and 2km west of M32 Junction 3. The proposals comprise the provision of 201 dwellings on the BZGs site together with a new 477sqm Clifton conservation hub comprising an office, education/meeting space, and a café, together with 120 parking spaces. BZG currently operates 1000-1700 Monday – Sunday across 364 days per year. In addition to the main zoo the site houses an education centre for school/community groups and university courses, and the Clifton Pavilion building which operates as a venue for hire throughout the day and evening. The existing site has provision for 340 cars across the north and west car parks and a further 600 spaces at Ladies Mile temporary car park, although use of Ladies Mile is limited to a specified number of days. It is noted that a separate planning application for the redevelopment of the BZG West Car Park for 62 dwellings was granted planning permission in February 2022, under reference 21/01999/F, which is now subject to judicial review. National Highways was not consulted on this application. The existing BZG site is due to close to visitors in September 2022 with the zoo relocating to the Wild Place Project site approximately 7.2km to the north. There will be an ongoing operational presence at the BZG site until final departure in late 2023 when the redevelopment of the BZG site is proposed to commence. No preapplication discussions have been held with National Highways.

Impact on the Strategic Road Network

Existing BZG Traffic Generation

Based on pre COVID19 car park ticket data and visitor numbers from 2019, on peak visitor days up to 980 visitor cars were parked on and off-site over the course of the day in addition to around 81 staff park either in West Car Park or on-street each day. Peak days typically occur in school holidays throughout the year and on weekends. Based on BZG visitor records 513,000 attended in 2019, equating to an average of 1,400 per day and 4,000 on peak days. On an average day BZG generates 113 two-way trips in the AM

peak and 158 two-way trips in the PM peak. It is noted that the BZG site typically generates higher vehicular trips at weekends than weekdays, when events are more frequent.

Proposed development

The application proposes 37 houses with a provision of 47 parking spaces and 164 apartments with a provision of 71 parking spaces. The supporting Transport Statement (TA) sets out that parking for the apartments would be allocated to specific residences with future occupiers advised of whether parking was allocated for their use. Bristol City Council has confirmed that residents would not be eligible to apply for onstreet parking permits, which therefore removes the opportunity for overspill parking onto surrounding highways. On this basis 93 apartments are being promoted as ‘car free’. The TA derives the trip generation of the proposed residential development based on the TRICS database using the ‘Private House’ and ‘Private Flat’ categories. The TA calculates the traffic generation of the vehicular hub based on the number of staff to be employed, the size and frequency and educational sessions and historic travel surveys for evening events. It is assumed that visitors to the gardens would be resident in the local area and as such would not attract any additional vehicular trips to the site. Based on the sustainable transport opportunities surrounding the BZG site and the proportion of car free dwellings being proposed the presented trip rates are considered acceptable for this development. The forecast trip generation of the proposed development is show below.

Site Traffic Generation (Two-way trips)			
	Existing BZG (Average)	Proposed Residential (201 dwellings) and hub	Net Change
AM Peak (0800-0900)	113 (81)	70	-43 (-11*)
PM Peak (1700-1800)	158 (126)	63	-95 (-63*)

*Figure in brackets would occur on days that no meetings/events take place at either the Clifton Pavilion or the Hide buildings during the day or evening in the existing situation, or in the evening at the hub in the proposed scenario.

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

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

Recommendation

National Highways has no objections to application 22/02737/F

Natural England 1 of 3

Date: 05 July 2022

Our ref: 396676 Your ref: 22/02737/F

Dear Case Officer

Planning consultation: 22/02737/F

Redevelopment of site to include 201 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selective demolition of buildings. (Major)

Location: Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

Thank you for your consultation on the above dated 14 June 2022 which was received by Natural England on the same date. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on:

- Avon Gorge Woodlands SAC
- North Somerset and Mendip Bats SAC

Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation. Without this information, Natural England may need to object to the proposal. Please re-consult Natural England once this information has been obtained. Natural England's further advice on designated sites is set out below. Additional Information required Despite the proximity of the application to European Sites, the consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment. It is Natural England's advice that the proposal is not directly connected with or necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out. Natural England must be consulted on any appropriate assessment your authority may decide to make. Avon Gorge Woodlands SAC Recreational impacts from housing developments in the West of England were recognised in the Joint Spatial Plan Habitats Regulations Assessment and, have been screened in as a likely significant effect in the West of England Spatial Development Strategy (SDS). The need for a strategic solution for recreational pressures on designated sites within the West of England has been strongly indicated through the SDS process so far. In our opinion, the location and scale of this proposal means it could have a likely significant effect on Avon Gorge Woodlands SAC from an increase in recreational pressure. Sufficient information must be provided on this issue to inform a HRA. A HRA must be completed proceeding to appropriate assessment where likely significant effects cannot be screened out. It may be possible to screen out this proposal from further assessment if there is significant provision of onsite green space in excess of the existing Bristol City Council open space standards. It is noted that the BCC open space standards have not been updated for a significant time and are modest in comparison with expected national and regional green infrastructure policy. The National Green Infrastructure Standards have been piloted in the West of England through the development of the Joint Green Infrastructure Strategy and

we would expect this work to follow through into the development of Local Plans and Green Infrastructure Strategies by the West of England Unitary Authorities. Should it not be possible for a likely significant effect on the Avon Gorge Woodlands SAC from recreational pressure to be screened out, appropriate mitigation must be secured. This could include for example financial contributions to the management costs of the Avon Gorge Woodlands SAC. North Somerset and Mendip Bats SAC The application site falls within consultation zone Band B of the North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document (North Somerset Council, 2018). While there is no requirement for development in Bristol to follow the SPD, we strongly recommend that it does where an application site lies within the consultation zone. The consultation zone extends from horseshoe roosts in close proximity to Avon Gorge Woodlands SAC which are considered to be functionally linked to the North Somerset and Mendip Bats SAC. The consultation zone indicates the potential importance of habitats on site to horseshoe bats associated with the SAC. For sites within Band B of the consultation zone, a full season of bat surveys are generally required unless minor impacts can be demonstrated. Due to the presence of moderate quality foraging habitat within the application site (as noted in the Ecological Appraisal (The Landmark Practice, May 2022)) Natural England advise that a full season of surveys should be undertaken to assess the importance of this site to the SAC. Results of bat surveys from August to October 2021 have been presented in the Ecology Appraisal. It is understood that further surveys have been undertaken between April to June 2022 however, the results of these surveys are not currently presented. The results of these surveys are required for Natural England determine the impact of the proposal on the North Somerset and Mendip Bats SAC. Please re-consult Natural England once this information has been obtained. The survey results presented so far show that only one lesser horseshoe bat call was recorded on site and no horseshoe roosts are present. Should the survey results from April to June show a similar pattern of horseshoe bat activity then we consider it unlikely that this proposal will result in a Page 3 of 3 significant impact on the SAC through the removal of suitable habitat within the site. To the north of the application site is the Clifton Downs which form suitable habitat for horseshoe bats associated with the SAC. The application must therefore demonstrate that it will not result in increased light levels on this habitat. Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence. Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service. Please consult us again once the information requested above, has been provided.

Yours sincerely Amelia Earley Wessex Team

Natural England 2 of 3

Date: 31st January 2023

Thank you for consulting Natural England on the above application. Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority. Avon Gorge Woodlands SAC The Shadow HRA screens in a likely significant effect to the Avon Gorge Woodlands SAC due to dust generated from construction vehicles moving to and from the application site on roads within 50m of the SAC. We concur that the mitigation measures in Section 12 of the Shadow HRA will be sufficient for construction vehicle dust to not result in an adverse effect on the integrity of the SAC. Regarding recreational pressures on the Avon Gorge Woodlands SAC, Natural England have advised Bristol City Council in our recent response to their draft

local plan that recreational pressures at the SAC must be assessed and is likely to result in a Likely Significant Effect on the SAC. This is consistent with the conclusions of the HRA Scoping Report produced for the WECA Spatial Development Strategy. We consider that the proposals include mitigation to ensure that the proposal will not result in an increase in recreational pressure on the SAC, the proposals provide onsite greenspace which exceeds BCC's open space quantity standards. Other Designated Sites Natural England concur with the conclusions of the Shadow HRA regarding the North Somerset and Mendip Bats SAC and the Severn Estuary SPA/SAC/Ramsar. Kind regards, Amelia Planning Lead Advisor Wessex Team

Natural England 3 of 3

Date: 8th March 2023

Hi Case Officer,

Thank you.

You are correct, our advice is that when considered both alone and in combination with other development we do not consider that the proposed development would result in an adverse effect on the integrity of the SAC. Our comments regarding contributions to greenspace management were made in reference to increased pressure on greenspaces in the vicinity of the development generally rather than specifically about the Avon Gorge and Woodlands SAC.

Kind regards,

Amelia

Amelia Earley (she/her) Planning Lead Advisor Wessex Team

Nature Conservation (BCC)

Date: 2nd March 2023

Nature Conservation Comments - 22/02737/F - Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA, March 2023

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

The Ecological Appraisal (EA) (The Landmark Practice, October 2022) sufficiently addresses the ecological features of the site by providing the results of extensive surveys, and outlines appropriate protection, enhancement, and mitigation measures required for this proposed development.

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

granted. The license application will conclude how the three tests are met in detail. This is for the planning officer to make final judgement.

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

The Habitat Regulations (Screening and Appropriate Assessment)

TLP provided a shadow Habitats Regulations Assessment (HRA) in October 2022, and an updated HRA in February 2023 which considered the likely significant effects (LSE) of the proposed development on National Site Network Sites within 10 kilometres (stage one screening) and Appropriate Assessment (AA). The updated HRA contained a site in the incombination assessment which had previously not been included. The shadow HRA concluded that no LSE are anticipated via noise, visual or hydrological/drainage to the Severn Estuary European Marine Sites, and no LSE are anticipated on the qualifying features of the North Somerset and Mendip Bats Special Area of Conservation (SAC). In the absence of mitigation, the proposed development has the potential to result in LSE upon the Avon Gorge Woodlands SAC as a result of potential air quality impacts from increased dust generated from the movement of lorries to and from the proposed development site, known as “track-out routes” during the construction phase. The Air Quality Assessment produced for this proposed development (Hydrock Consultants Limited, 2022) concludes that: “Overall, the Proposed Development is considered to be Medium Risk for nuisance dust soiling effects, Low Risk for PM10 health effects and to be Medium Risk for ecological impacts, in the absence of mitigation.”

The AA considers whether a plan or project could result in an Adverse Effect on Integrity (AEoI) of one or more National Site Network sites, either alone or in combination with other projects. Mitigation measures to reduce the risk of impacts to the Avon Gorge SAC during construction are outlined in appendix A of the Air Quality Assessment (Hydrock Consultants Limited, 2022) and are recommended to be conditioned within a Construction Environmental Management Plan below. With the specified mitigation in place to protect the Avon Gorge SAC, there would be no anticipated AEoI on a National Site Network site within 10 kilometres of the proposed development and the AA concludes that there is unlikely to be an AEoI to the Avon Gorge Woodlands SAC from in-combination effects between the proposed development and three other large-scale proposed developments in the surrounding area. Natural England provided feedback on the shadow HRA dated October 2022, which states that: “We consider that the proposals include mitigation to ensure that the proposal will not result in an increase in recreational pressure on the SAC, the proposals provide onsite

greenspace which exceeds BCC's open space quantity standards." BCC has not received feedback from Natural England on the updated HRA (February 2023) as of March 2023, but understand comments are expected soon.

The conclusions of the shadow HRA/AA (2023) are supported and the HRA/AA is adopted by BCC as competent authority.

If this application is deemed to be approved, the following conditions apply.

Method statement: Avon Gorge Exhibit translocation

Prior to the commencement of the proposed development, a species list and method statement for the translocation of the Avon Gorge Exhibit to another location within the site shall be provided to Bristol City Council for approval in writing.

Additionally, the Landscape General Arrangement (Roofscape) West (1 of 4) drawing (no. 11585-LD-PLN-111, Land Use Consultants) must be updated to reflect that the Avon Gorge Exhibit is being translocated to the new Avon Gorge and Downs Conservation hub. This updated plan should be provided to discharge this condition.

Reason: To safeguard rare species endemic to the Avon Gorge.

30-year Landscape and Ecological Management Plan

The applicant shall submit a 30-year Landscape and Ecological Management Plan (LEMP) for all retained, enhanced, relocated and created habitats on site for approval in writing by Bristol City Council. The LEMP should set out management compartments, objectives, and prescriptions in order for all retained, enhanced, relocated and created habitats on site to reach their target condition, and 36% gain in habitat units and 376.35% gain in hedgerow units to be achieved as shown in the BNGR (The Landmark Practice, October 2022) for this application. It should also show how management of the site will be resourced and monitored. The LEMP shall be reported to the LPA once every 5 years.

Reason: Ecological enhancement is needed to meet the requirements of the revised National Planning Policy Framework (NPPF, 2021). The NPPF states in paragraph 174 (d) on page 50 that "Planning policies and decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity..." and the Environment Act (2021) requires habitats to be maintained for 30 years after development is completed (schedule 7A, Part 1, paragraph 9) to secure longterm net gains for biodiversity.

Construction Environmental Management Plan

Prior to commencement of the proposed development, the applicant shall submit a standalone Construction Environmental Management Plan (CEMP) for approval by Bristol City Council. This shall include measures to comply in full with the recommendations made in the Ecological Impact Assessment (The Landmark Practice, October 2022) and the Shadow HRA (The Landmark Practice, October 2022) i.e to avoid offences against legally protected and priority species and habitats during construction (including site clearance, pollution prevention, demolition, vehicular movements and lighting impacts), and to avoid any impact on the Avon Gorge Woodlands SAC. Provision shall be made within the CEMP for the appointment of an Ecological Clerk of Works (ECoW) to undertake site visits, supervise ecologically sensitive operations and ensure the mitigation measures outlined in the shadow HRA are implemented to protect the Avon Gorge SAC.

The mitigation measures required during construction to protect the Avon Gorge SAC outlined in the Air Quality Assessment (Hydrock Consultants Limited, 2022) via the Shadow HRA (The Landmark Practice, October 2022) are as follows:

- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.
- Avoid dry sweeping of large areas.
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
- Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.
- Record all inspections of haul routes and any subsequent action in a site logbook.
- Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior leaving the site where reasonably practicable).
- Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.

These mitigation measures must be included in the CEMP and implemented during construction.

Where considered to be required by the project ecologist, the CEMP shall be supplemented by a Method Statement for a Preliminary Method of Working (MS-PMW) to avoid accidental harm being caused to any protected, priority or notable habitats or species.

The proposed development shall be carried out in full accordance with the approved details or any amendments agreed in writing by Bristol City Council.

Reason: To demonstrate compliance with: the 1981 Wildlife & Countryside Act (as amended); the 1996 Wild Mammals Protection Act; the 2017 Habitats Regulations; the 2006 NERC Act; the 2006 Animal Welfare Act; and the 1992 Protection of Badgers Act.

Precautionary Method of Working (PMW)

Prior to commencement of the proposed development, a method statement for a Precautionary Method of Working (PMW) shall be prepared by a suitably qualified ecological consultant and submitted to and approved in writing by the Local Planning Authority. The PMW shall include measures to consider/protect the following species and their habitats:

- a. Amphibians
- b. Bats*
- c. Invasive species
- d. Slow worm
- e. Nesting birds
- f. Invertebrates
- g. Badgers,
- h. Hedgehogs**

with respect to vegetation/ site clearance, and construction activities.

The proposed development shall be carried out in full accordance with the approved method statement.

*As specified in the EA (TLP, October 2022) prior to demolition and following the relocation of the animals, the two timber sheds (which housed the Squirrel Monkeys) should be reinspected, with demolition undertaken in a sensitive manner under ECoW by a bat licenced ecologist.

** Hedgehog is a Priority Species in the Bristol Biodiversity Action Plan

Reason: To ensure the protection of legally protected and priority (Section 41) species which are a material planning consideration. And to demonstrate compliance with the 1981 Wildlife & Countryside Act (as amended) and the 2017 Habitats Regulations.

Guidance: According to paragraph 180 (page 52) of the National Planning Policy Framework (2019), 'Planning policies and decisions should... limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'

Bat Mitigation Method Statement

Prior to commencement of the proposed development, a bat mitigation method statement in accordance with outline mitigation strategy and method statement included within the approved Ecological Appraisal (ref. 3442, October 2022) shall be submitted to Bristol City Council for approval in writing. The method statement shall include the following:

- A plan and/or photographic evidence showing bat boxes erected pre-commencement of works for enhancement of the existing potential roosting features on site (prior to bat controlled exclusion from existing roosts, if this is required)
- The products used in place of Breathable Roofing Membranes (BRMs) (known to be harmful to bats as they can become entangled in the fibres)
- Method statement for moving bat box confirmed roosts that are proposed to be resited
- Bat Controlled exclusion method statement (if a controlled exclusion is required)
- Protection of commuting and foraging habitat to be retained

Reason: To provide an overlap in roosting habitat (lost and created) in order to prevent loss of roosting habitats for bats, and to ensure the protection of legally protected and priority (Section 41) species which are a material planning consideration. And to demonstrate compliance with the 1981 Wildlife & Countryside Act (as amended) and the 2017 Habitats Regulations.

Ecological Mitigation and Enhancement Strategy (EMES)

Prior to the commencement of the proposed development the applicant shall submit an Ecological Mitigation and Enhancement Strategy (EMES). This shall include details of the mitigation provided for:

- a. Amphibians and reptiles (the creation of 3no. hibernacula adjacent to the new lake and in the dense planting around the Monkey Temple)
- b. Bats (1. To mitigate for roost-loss, 20no. bat boxes installed in pairs on mature trees throughout the site and 20no. integrated into new and retained buildings prior to works commencing. 2. For enhancement, 10no. installed in pairs on mature trees throughout the site, and 10no integrated into new and retained buildings)
- c. Nesting birds (1. 30no. bird boxes integrated into the fabric of the new buildings and on mature trees throughout the site to include 6no terrace nest boxes suitable for house sparrow and 12no. suitable for swift, to be placed in three groups of four. 2. 31no existing bird boxes re-sited within retained habitat on site)

d. Invertebrates (bricks and boxes integrated in to new buildings)

e. Hedgehogs* (boxes and permeability measures);

The location, specification, height and orientation of these features shall be shown on a site plan.

The proposed development shall be carried out in full accordance with the approved details or any amendments agreed in writing by Bristol City Council.

Reason: (1) The Natural Environment and Rural Communities (NERC) Act 2006 (Section 40) obliges the LPA ‘... in exercising its functions, [to] have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’. In order to discharge its biodiversity duty, the LPA must satisfy itself that all developments deliver ecological enhancement wherever reasonably possible; (2) Ecological enhancement is a requirement of the revised National Planning Policy Framework (2021) which states (in paragraph 174) that ‘Planning policies and decisions should contribute to and enhance the natural and local environment...’.

* Hedgehog is a Priority Species in the Bristol Biodiversity Action Plan

Method Statement: Living Roofs

Prior to commencement of the proposed development the applicant shall submit a method statement prepared by a suitably qualified ecological consultant or landscape architect to be approved in writing by Bristol City Council for the creation of green and brown roofs. This shall include:

- details of the seed mix proposed (to not include large areas of sedum)
- features for invertebrates e.g stone and log piles, areas of bare ground and rope coils,
- depths of substrate
- construction method
- and a maintenance plan e.g watering/care schedule and details of the provision of new plants should the originals fail

All details shall be shown on a scale plan of the site.

The proposed development shall be carried out in full accordance with the details submitted or any amendments approved in writing by the Council.

Reason: To conform with Policy DM29 in the Site Allocations and Development Management Policies Local Plan, which states that: ‘Proposals for new buildings will be expected to incorporate opportunities for green infrastructure such as green roofs, green walls and green decks’.

Vegetation Clearance

All species of wild birds, their eggs, nests and chicks are legally protected until the young have fledged. No clearance of vegetation or structures suitable for nesting birds shall take place whilst birds are nesting, which is typically between 1st March and 31st August inclusive in any year without the prior written approval of the Local Planning Authority. If works are proposed within this period, the Authority will require evidence provided by a suitably qualified ecologist that no breeding birds would be adversely affected including by disturbance before giving any approval under this condition. Where checks for nesting birds are required, they shall be undertaken by a qualified ecological consultant no more than 48 hours prior to the removal of vegetation or the demolition of/works to buildings.

Reason: To ensure that wild birds, building or using their nests are protected, to

demonstrate compliance with the 1981 Wildlife & Countryside Act (as amended).

Lighting Plan

Prior to the commencement of the proposed development, details for any proposed external lighting shall be submitted to and agreed in writing by the Local Planning Authority. The proposed development shall be undertaken in accordance with the approved details. This shall include a lux level contour plan of the site pre-development and post-development. The lux contour plan shall show lux levels at frequent intervals (lux levels at 0, 0.2, 0.5, 1, 1.5, 2, 3, 4, 5 lux and higher are particularly useful) and extend outwards to additional levels (above the pre-existing background light level) of zero lux. The lux contour levels shall be superimposed on a site plan which includes all land that is affected by raised light levels (including potentially land outside the red line planning application area) and shall reflect the use of any proposed mitigation, e.g visors.

Advice note: The lighting design should be in accordance with BCT & ILP Guidance Note 08/18 'Bats and Artificial Lighting in the UK'

<https://cdn.bats.org.uk/uploads/pdf/Resources/ilp-guidance-note-8-bats-and-artifici>. Where external lighting is required, it should be motion triggered by passive Infrared sensors (where safety and security allows) and mounted on the horizontal with no upward tilt, away from retained features.

Guidance: According to paragraph 180 (page 52) of the National Planning Policy Framework (2019), 'Planning policies and decisions should... limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'

Reason: To conserve legally protected bats and other nocturnal wildlife complying with the 1981 Wildlife & Countryside Act (as amended).

Ecology Report

If the proposed development has not commenced within 18 months of permission granted, an updated ecological survey shall be carried out by a suitably qualified ecological consultant and shall be submitted to and approved in writing by the Local Planning Authority. The survey shall conclude whether the EMES, PMW or Bat Mitigation Method Statement should be updated, and if so, these shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any works.

The proposed development shall then be undertaken in full accordance with the approved Ecology report/EMES/PMW/Mitigation Method Statement.

Reason: To ensure legal and policy compliance with regard to valued ecological species and habitats as well as to invasive plant species.

Advice Note: Bats

A grant of planning permission does not remove the legal protection afforded to bats and their roosts. If, during any work not granted a European Protected Species License (EPSL) any bats (or signs of bats, such as droppings) are found, an immediate halt should be called and a bat worker/ecologist should be consulted to determine if and how the works can proceed lawfully, with or without a mitigation licence.

The bat activity, building and tree surveys (conducted by The Landmark Practice, 2022), are valid for 18 months only. If the works have not commenced within 18 months of the survey

date, then the survey should be repeated and the results submitted to Bristol City Council for written approval, prior to commencement.

Should the survey result in the need for mitigation measures, then these must be approved in writing by the Local Planning Authority and implemented in full prior to the commencement of the proposed development.

Northcote Road Residents Association 1 of 3

Date: 20th March 2023

Dear Case Officer

Re: Planning Application Reference 22/02737/F at Bristol Zoo Gardens, Bristol, BS8 3HA – Response Letter Anstey Horne have been asked to review the additional information published in the planning portal following our letter dated 19 December 2022. These include Response to Case Officer's Note published on 13 January 2023, as well as Daylight Distribution Contours, Two Hours Sun on Ground Study and summary email produced by Delva Patman Redler and published on the planning portal on 3 February 2023.

Regarding the DPR's response to Anstey Horne letter, we would like to bring your attention to the following

inaccuracy in Response to Case Officer's Note where DPR state:

"When considering the daylight implications in this situation it is important to note that the retained VSC levels to 78 (93%) of the 84 windows are at above 20% which is considered acceptable and shows that the rooms will remain with the potential to receive good levels of daylight. Of the 6 windows that do not retain 20% VSC, 4 are believed to serve entrance ways which are not habitable rooms and have been included for completeness."

[emphasis added]

The above statement is incorrect, as of 84 windows considered, only 62 windows (73.8%) will have retained

VSC value of more than 20%. Moreover, when assessed against the BRE guidelines, 60 (71.4%) will fully comply

with the VSC targets (min retained value of 27% VSC or max 20% reduction if below), leaving 24 that will experience an adverse effect as a result of the development.

This inaccuracy skews the overall picture. Moreover, while in some circumstances, residual VSC values of 20%

can be considered acceptable, it is at the local authority's discretion to accept this argument or not for this specific area.

We noted that more recently, DPR updated their report to incorporate our site notes and provided an updated

summary of results (published on 3 February 2023). Once non-habitable rooms and windows were removed,

the updated results show that 50 (76%) out of 60 windows tested and 29 (91%) of 32 rooms will comply with

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the BRE guidelines. Where DPR point to some improvements in performance, this is down to discounting a

number of windows in non-habitable rooms and not to a lesser impact of the proposals on the properties. Moreover, once the layout was updated, the results showed more material impact in daylight distribution terms.

Furthermore, the DPR emphasise the benefit from the gap between the proposed blocks as below:

"...5 Northcote Road is located opposite the gap between the blocks meaning that light will continue to penetrate deep into the room. "

and

"Furthermore, the scheme has been designed to incorporate a gap directly opposite these buildings ensuring

that these properties generally remain with good levels of daylight. "

Again, DPR seem to disregard the fact that the gap is currently occupied by 14m high mature tree of a spread

between 6 to 8m. Based on the Arboricultural Report (prepared by WTC and dated 24 May 2022) and the proposed landscape plan, it is clear that the tree (T119 Lawson Cypress) is evergreen and will be retained.

Therefore, it is misleading to state that the gap was incorporated in the design to allow for access of light to

Northcote Road properties, given the tree is intended to stay and will limit the access of light through the gap

between the proposed blocks.

The size and scale of the subject tree are illustrated in the street image below taken from Google.

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Below is the extract from the DPR report on which we marked in red the position of tree T119 and based on

the survey data, T119 reaches a level similar to the average level of the proposed blocks (around 82m AOD).

We note that Bristol City Council have previously raised some concerns in relation to the impact of trees on

the development site itself and requested an additional assessment. Therefore, it is clear that the possible impact of trees is recognised by the local authority.

The DPR study does not take into consideration any effect of trees on the development site, which intend to

remain and are part of the design for the site. We see this approach common as an initial assessment.

We appreciate that the effect of trees can be difficult to assess in some cases and the BRE guide states:

"It is generally more difficult to calculate the effects of trees on daylight because of their irregular shapes and

because some light will generally penetrate through the tree crown. Where the effect of a new building on

existing buildings nearby is being analysed, it is usual to ignore the effect of existing trees. This is because daylight is at its scarcest and most valuable in winter when most trees will not be in leaf."

The BRE guidelines is more specific when it comes to the impact of the existing trees on the new proposed

units and outlines ways of calculating the impact of trees.

"Sometimes, however, trees should be taken into account, for example where a new dwelling is proposed near

to large existing trees. There may be concern that future occupants of the dwelling may want the trees to be

cut down if they block too much skylight or sunlight."

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The guidelines also explain the difference between the changing shade of a deciduous tree and the more solid

and constant shade of evergreens.

Overall, it is clear that trees can reduce daylight and sunlight accessing the property, especially if evergreen trees are considered. Therefore we ask the local authority to consider this fact in their decision. While the BRE guidelines provide detailed advice on assessing trees and proposed buildings and limited information on the existing buildings, we feel it is inappropriate to ignore the impact of a subject large evergreen tree on light within the Northcote Road properties. Moreover, pointing towards incorporating the gap between the blocks as a way to preserve access of light and ignoring the fact that a significant mature evergreen tree occupies the gap is misleading. Please note that the subject tree sits within the development site and it does form a part of the proposal for the site. Should the assessment be carried out with the relevant trees in place, it is reasonable to assume that it will show more realistic results where areas of Northcote Road properties are impacted to a higher degree due to lower baseline figures than currently reported. Selective and unrepresentative arguments can skew the overall picture, therefore we ask the local authority to consider the content of our letter alongside other evidence produced by our client in considering the acceptability of the scheme.

Yours sincerely,
Anstey Horne

Northcote Road Residents Association 2 of 3

Date: 19th December 2022

Dear Case Officer

Re: Planning Application Reference 22/02737/F at Bristol Zoo Gardens, Bristol, BS8 3HA – Objection to adverse impacts on 1 to 6 Northcote Road

Anstey Horne have been appointed by Northcote Road Residents Association to prepare an objection letter in

regard to adverse impacts the proposed scheme at Bristol Zoo is expected to have on 1 to 6 Northcote Road.

To familiarise ourselves with the relevant context, we visited the site on 8 December 2022. We gained access

to numerous apartments at 1 to 6 Northcote Road, recorded a sample of measurements and took photos to

understand the layout of the properties.

We have also reviewed the documents published on the planning portal under the application number 22/02737/F, paying special attention to the following reports:

- Daylight and Sunlight Report – Delva Patman Redler – 8 April 2022
- Daylight and Sunlight Addendum Report – Delva Patman Redler – 18 October 2022
- Overshadowing Report - Delva Patman Redler – 18 October 2022

While the Overshadowing Report relates to the development site itself, two other documents relate to the

impact of the proposed scheme on the neighbouring residential amenity. We cross-referenced the Daylight

and Sunlight reports with our observations made during the site visit and we raised the following issues:

1. Methodology

- In June 2022 the BRE Report 209, 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' was updated to the third version 2022. We note, however, that while the methodology for the internal assessment of the proposed light levels diametrically changed, the previous tests for the neighbouring properties remained in place.

2

- Categorisation of magnitudes of impact and significance of effects (s.5 of DPR's report 8 April 2022) – We note that the BRE guide in Appendix H allows the guidelines to be utilised for environmental impact assessment (EIA); however, using EIA criteria to describe daylight and sunlight impact outside EIA documents is unusual.

- Flexible application of the guidelines and alternative target values (s.6 of DPR's report 8 April 2022) – We note the DPR's report lists some examples that are considered to be of relevance, for example appeal ref: APP/E5900/W/17/3191757 and appeal ref: APP/E5900/W/17/3171437. Please note that they relate to high-density urban areas in London, which do not resemble the Bristol Zoo development site. We appreciate the general methodology, however it is important to emphasise that this is only relevant for the specific contextual location and in our opinion, not applicable to the subject site. The lack of clarity may lead to misinterpretation of impacts by the reader.

2. Study

- Layout utilised in the assessment

We note that DPR have not located internal layouts for 1 to 6 Northcote Road despite numerous information available online. While these are not all up to date online, they could have helped better inform the understanding the building layout and impact the results. DPR's report states that where they have not found plans online, they utilised a notional 4m deep layout in their assessment. This is not unreasonable where no relevant information is available online.

However, DPR chose not to present their No Sky Line (or Daylight Distribution) results on the contour drawings. Therefore, the interested parties could not comment either on the internal arrangement utilised in their assessment or on the actual loss of sky visibility within their rooms.

We request the daylight distribution contour drawings are included within the revised report for transparency. We would then request a period of further consultation so our client may consider further representation.

Please note that we have visited the ground, first and the second floor at 6 Northcote Road, the lower ground floor at 5 Northcote Road and all floors at 1 and 2 Northcote Road. We have also received additional information in regard to the lower ground floor at 6 Northcote Road.

Based on our findings during the site visit, we can confirm that numerous rooms in the most crucial areas on the lower ground and ground floors are around 5.2m deep. The room depth is crucial to understand the impact on the sky visibility, which is discussed in more detail below.

3. Results

We have not had access to the 3D analysis model utilised in DPR's assessment to comment on the accuracy and we assume that it has been correctly compiled using the source information described in the body of their report.

3

To assess the daylight and sunlight within 1 to 6 Northcote Road, DPR utilised Vertical Sky Component (VSC), Daylight Distribution (DD/NSL) and Annual Probable Sunlight Hours (APSH) and we agree with these tests. However, we find some results questionable and we request further clarification.

As mentioned above, we visited a number of properties and below we present details of the internal arrangement of some crucial lower ground floor areas and corresponding results.

- 6 Northcote Road – lower ground floor - bedroom – no access, layout based on the floor plans – 4.75m

deep, 4m wide

The above bedroom is indicated in DPR's report as B01 - R1 served by windows W2 and W3. The results note VSC reduction marginally beyond the BRE suggestion to W2 and NSL reduction from 100% to 90% (1.26m²) which is considered within the BRE allowance. However, we understand this was achieved based on the notional depth of the room of 4m. Given the percentage loss of light to the actual area of sky visibility lost, it is understood that the area of the tested room was 12.6m², which is, in fact, around 18.5m².

Should our assumptions be correct, the percentage loss of NSL is likely to fall beyond the BRE allowance of 20%. Given the actual area of the room, the residual NSL value is expected to be around 65%-75%, however to comment on this further, we would need to understand the layout utilised in DPR report. Normally, the layout used in the assessment can be identified from the daylight distribution (DD/NSL) drawings, however these were not included in the DPR's report and we request them to be submitted as a part of the amended report.

4

- 5 Northcote Road – lower ground floor - kitchen/dining room 5.2m deep, 3.4m wide

The above kitchen/dining room is indicated in DPR's report as B01 - R1 served by windows W1 and W2. The results note full compliance in VSC and NSL terms. Moreover, the NSL results show room receives sky visibility to 99% in the current condition and less than 1% change post-development. It must be noted that W2 from DPR's report serves an adjacent bathroom and the above room is only served by one main window and small glazing above the entrance door. In the current condition, the sky is only visible from the front of the room and it is unlikely that the result would show values near 99% when the actual layout is assessed. Moreover, light is precious in this main habitable room and any loss of light would impact the enjoyment and use of this home.

We appreciate that DPR have not had access to our client's property and used reasonable notional layouts at the time of the test. However, the daylight distribution contour drawings were not included in the report, therefore the discrepancies and how they may affect the results were not addressed. Therefore, we request this be included in the updated report for clarity and further comments and APSH tested for the main window in this room which is W1.

5

- 2 Northcote Road – lower ground floor – living/dining room – 5.2m (to the bay window) deep, 4.7m wide

The above living/dining room is indicated in DPR's report as B01 - R1 served by windows W1, W2 and W3. The results note VSC reduction beyond the BRE suggested target values to all three windows. Moreover, the study notes a reduction of NSL from 99% to 79% (equivalent to 4.69m² of loss) which is borderline.

Similar to the above we assumed that the layout utilised was notional 4m deep. Again, we cannot confirm this without seeing the results on the contour drawings.

Should our assumptions be correct, the percentage loss of NSL is likely to fall beyond the BRE allowance of 20%. During the site visit we did not observe sky being available in the rear part of the room and it was clear that any material loss of light would impact the use and enjoyment of this room which the losses on the floor above further worsening the enjoyment of this home.

Additionally, we request that the overshadowing assessment to the front garden is provided. The garden indicated on the image below, is the main garden of the property and we request this is added to the report.

6

- 1 Northcote Road – lower ground floor – living room – 5.2m (to the bay window) deep, 4.7m wide

The above living room is indicated in DPR's report as B01 - R1 served by windows W1, W2 and W3. The results note VSC reduction beyond the BRE suggested target values to all three windows.

7

Moreover, the study notes a reduction of NSL from 99% to 71% (equivalent to 6.45m² of loss) which is also beyond the BRE allowance of 20%.

We assumed that the layout utilised was notional 4m deep and again, we cannot confirm this without seeing the results on the contour drawings.

Should our assumptions be correct, the percentage loss of NSL is likely to fall beyond the BRE allowance of 20% further and impact the room significantly. Moreover, losses beyond the guidelines on the ground, first and second floor are also present. It needs to be noted that the depth of the rooms on the first and second floor are around 5.2m with the second-floor bedroom being 4.2m deep and it is likely that the actual impact is more severe than reported. Therefore, we request the daylight distribution contour drawings illustrating the layout utilised for the assessment are added to the report.

Similarly to 2 Northcote Road, we request that the overshadowing assessment to the front garden is provided. The garden indicated on the image below, is the main garden of the property and we request this is added to the report.

8

Summary

We have visited the site to familiarise ourselves with the properties at 1 to 6 Northcote Road and their current relationship with the development site. We have also reviewed the DPR'S Daylight and Sunlight reports available under planning application 22/02737/F.

We noted that the report records mainly minor adverse impacts of the properties at 1 to 6 Northcote Road. We understand that DPR utilised a measured survey to position neighbouring windows, therefore, we have no reason to question the correctness of VSC results. The VSC method is a simplistic initial tool for establishing light potential and it is recommended it is considered alongside the DD (NSL) method. The latter is, however highly dependent on the accurate room layout and we do not believe the notional 4m room depth, as understood to be used in DPR's report, represents the actual situation accurately.

We cannot be certain what was utilised in the assessment as DPR did not include the DD contour plots within their report. Therefore, it is essential this is supplied for clarity and further comments. During the site visit, we confirmed that most of the relevant rooms are around 5m deep and it is likely they will suffer a larger than the reported reduction of light.

Furthermore, the DPR report did not include the overshadowing assessment to the main garden amenities at 1 and 2 Northcote Road which are located at the front of the properties. We request this to be provided and we would appreciate if the sun on ground assessment was accompanied by transient overshadowing, which would provide a visual representation of the changes in the shadow cast by the proposed scheme on the neighbouring amenity during the course of the day.

Our client understands the need to provide housing and is merely asking for the proposed scheme to be respectful of their properties. They urge the Applicant to consider amendments to the scheme which will maintain adequate levels of natural light to their properties. They also would like the Applicant to be aware that they are prepared to assert their rights of light through legal means if such a need arises. To avoid that, they would welcome any necessary amendments to the scheme as early as possible.

Concluding, we are of the opinion that the information provided by the Applicant is not complete at this stage and the Council is advised to request the additional information listed above to be provided to have the full picture of the actual impact on the neighbouring properties before determining the application. Upon submission of the additional elements, we would welcome a period of consultation which would allow us to comment on the amended report if needed.

Yours sincerely,

Anstey Horne

Northcote Road Residents Association 3 of 3

Date: 6th February 2023

Dear Sir/Madam

Planning Application Ref 22/02737/F

Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA

Introduction

We write on behalf of the Northcote Road Residents' Association, to raise objection to the above application seeking full planning permission for redevelopment of the site to include 196 residential units (Class C3), the provision of community floorspace (Class E, F1 and F2) and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), infrastructure, works to listed buildings, and selection demolition of buildings.

As will be apparent from the numerous individual letters of objection already submitted, local residents have numerous concerns about this proposal.

Section A : Unnecessary and Insufficiently Mitigated Harm to Heritage Assets and the Clifton Conservation area

1. These concerns start with the loss of an established, nationally recognised zoological facility and its gardens, a concern which is shared by the Council's Conservation Advisory Panel.
2. The Panel was concerned that no evidence has been provided to indicate that the closure of the site, and its change of use, is economically necessary. Neither have alternative uses been actively considered that might better preserve the significance of a nationally important heritage asset.
3. The approach to be taken in such cases is set out in the National Planning Policy Framework. Account must always be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
4. Where, as here, a development would lead to substantial harm or total loss of significance of a designated heritage asset, consent should be refused unless it can be demonstrated that this harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss except in very specific circumstances.
5. These include where the nature of the heritage asset prevents all reasonable uses of the site, a key consideration in relation to which the applicant has provided no evidence. Alternatively, approval may be justified where no viable use of the heritage asset can be found. Here again, however, no substantive evidence has been forthcoming.
6. Whilst we acknowledge that the proposal is not without merit in terms of providing residential and community facilities, there is nothing to indicate that the need for such facilities could not be met in other ways, either in a more appropriate scale, form and design on this site, or elsewhere on other sites. The unexpected availability of this additional space resulting from Covid that is being proposed for

housing development does not mean this proposed level of extra housing development is necessary nor significant compared with the demands of the Core Strategy:

i) Bristol City Council states in its November 2022 Local Plan Review (Appendix 1) that its Core Strategy requirement for 2026 is “likely to be exceeded by around 4000 homes and that it has a strong supply of planning permissions at present which are expected to enable the delivery of 2000 homes a year in the first (next) 5 years”.

ii) Clifton is not one of the key areas defined and targeted for essential housing development in Bristol’s Site Allocation and Development Management Policies.

iii) Although the 20% affordable housing level proposed is deemed acceptable it is low (40 units) and below the preferred percentage - even if construction were likely to begin at the earlier time required after planning permission was granted. This is far from certain given the site’s complexities. More importantly, this proposed development will have a negligible impact on the key stated core requirement for affordable housing. The November 2022 Local Plan Review states “There is expected to be a significant need for affordable homes ...this means homes to rent or buy that are put in reach of people not able to access market housing. The council is currently working with partners, local communities and developers to deliver 1,000 new affordable homes each year by 2024.... The greatest need in Bristol is for social rented affordable homes.” Given the low numbers of units and the expected premium prices within this Clifton development, even with the relevant discounts and financial support, this provision appears to be an insignificant token gesture. It will not deliver any meaningful public benefit towards the core affordable housing objective for Bristol.

7. We therefore consider that the primary test set out in the Framework, that the loss of the heritage asset is necessary to achieve those public benefits, is not satisfied.

8. The significance of the site, in conservation terms, extends far beyond the gardens.

9. The site contains a number of Grade II listed buildings whose significance is inextricably linked to the historical use and development of the site as a zoological facility. These include the Clifton Pavilion, Great Aviary/Parrot House, Giraffe House and the museum and activity centre. The loss of these buildings to residential use would erase all connection with the history of the site and its former use. (As would the proposed loss of the herbaceous border where so many people’s ashes have been spread.)

10. These buildings constitute a unique and irreplaceable link to a nationally important past. The loss of these buildings is in no way necessary to provide new residential apartments, which could certainly be provided within a more sensitive redevelopment of the site which secured the preservation of the historic buildings and an appreciation of their former use. Here again, the primary test set out in the Framework is not satisfied.

11. Furthermore, and set against this harm, we consider the public benefits of the proposal have been overstated. Public access to the site will be strictly controlled and time limited. The most likely public perception and experience of the site will be as an enclosed, gated, walled and very exclusive, housing community into which cars have been introduced for the very first time.

12. This will severely limit the public appeal of the site to people repeatedly attracted from across Bristol and the South West - which as the Zoo's data shows was previously the case. It will greatly degrade the site's value as a historic and community asset. Any public benefit in this regard will be very limited.

13. For local residents, the marginal public benefit of access gained to this site is insignificant compared with the existing, continuous 24/7 free public access provided by the adjacent and much larger and more spacious Clifton Downs – without any overbearing housing and full of carefully managed, mature trees and vegetation and open skies.

14. The local harm caused by the proposed development to the existing gardens and the surrounding neighbourhood and conservation area is considered to be far greater than the new benefits of extra access to an asset so severely diminished. This appears to be the viewpoint of 95% of the local community as evidenced by the continued, increasing and high level of objections – with an almost complete absence of local supporters for the development.

15. As far as the provision of new housing and community facilities is concerned, we consider the benefit of such provision to be severely compromised by a design and layout that would grossly overdevelop the site, to the detriment of the character, appearance, significance and setting of the Clifton and Hotwells Conservation Area, the zoological facility, its gardens and the listed buildings.

16. In particular, we consider the size, scale, height, repetitive form, design and massing of the development to be singularly lacking in the refinement and articulation that characterises existing surrounding development and which the perimeter development is directly adjacent to. The surrounding neighbourhood is compromised predominantly of large detached and semi-detached villas interspersed with some small-scale Victorian terracing, alongside individually designed institutional buildings, many of historic importance and all with pitched roofs. The scale, contrast and intensity of the proposed blocks of flat roofed perimeter development, rising up to a full six storeys in height often in close proximity would overpower existing buildings and utterly dominate the immediate surrounding townscape, as well as much of the character of the gardens themselves.

17. Far from being sympathetic or complementing the unique and special characteristics of the site and its surroundings, the proposed development would impose its own scale, form and character in a most egregious example of town cramming and “garden grabbing”. The resulting development would largely obliterate any appreciation of the original spatial characteristics and landscape quality of the zoological facility and its setting within the local townscape. The gardens would become enclosed and much of the immediate neighbourhood become enclosed and overpowered.

18. In no way can such a level of contrast in mass and design be considered sympathetic or enhancing as explicitly required under the NPPF: “decisions should ensure that developments are sympathetic to local character and history; including the surrounding built environment and landscape setting” while the November 22 Local Plan Review states that new development “will not be permitted where it would be harmful to local character and distinctiveness” and “be neighbourly, safeguarding the amenity and sustainability of existing development”.

19. We would add that the submitted computer generated images provided are highly selective, featuring views that fail to show the full extent of the development or which depict the proposed buildings from either an elevated or distant vantage point, thereby giving a misleading impression of the

true scale and extent of the proposed works. The Town and Visual Impact Assessment also failed to provide accurate scale representative views of the proposed site development from the street.

20. When these computer-generated images are compared with the elevational plans, it is abundantly clear the extent to which the full size, scale, height, bulk and massing of the buildings has been deliberately downplayed by the careful use of perspective and angle of view. Neither are these images shown clearly in the context of other or existing historic buildings and the surrounding conservation area.

21. In addition, imaginative depictions of non-existent trees and completely improbable, planted vegetation have been created to hide or disguise the overwhelming impact of the buildings and their unsympathetic design. The most recent egregious example was for a CGI view of Northcote Rd submitted in January. This included images of 2 large mature trees (estimated at least 50 years old) that would neither be permissible nor possible in two such small private 5 metres square gardens, so directly adjacent to the building. Conveniently, these images of trees obscured all views of the block from this particular chosen CGI generated street view. The images also failed to show the contrasting incongruence of the design by only depicting the Victorian terrace opposite in simple outline rather than visual detail. This is a completely misrepresentative and misleading image, intended to hide the obvious adverse impact of the development on its surroundings.

22. The reality is the development would be built out on a truly monolithic scale, overwhelming the surrounding buildings by its combination of mass, height and proximity and its repetitive, completely contrasting and unsympathetic form, giving rise to an extremely dominant and overpowering relationship with the existing surrounding development.

23. Such a scheme self-evidently fails to respect and preserve the special character and unique significance of the site and the numerous heritage assets.

24. The Framework makes it clear that great weight must be given to the conservation of heritage assets. Special justification is required where, as here, proposed development would lead to substantial or total loss of significance. Our analysis shows that the appropriate justification has not been demonstrated and, further, that the design quality of the scheme falls far below the standard demanded of such a sensitive and nationally important site.

25. In all these respects, the proposal fails to achieve an appropriate design, height, scale, massing, form and layout of development for the site such that the development would contribute positively to the area's character, reinforcing local distinctiveness and safeguarding heritage assets and the character and setting of historic buildings, gardens and conservation areas, as required by Policies BCS20, BCS21 and BCS22 of the adopted Bristol Core Strategy 2011 and Policies DM26, DM27, DM28, DM29 and DM31 of the adopted Bristol Site Allocations and Development Management Policies Local Plan 2014.

Section B: Unnecessary and Insufficiently Mitigated Harms to Residential Amenities

1. The proposal is equally problematic in terms of the effect on the amenities at existing nearby residential properties.

2. Whilst noting the daylight and sunlight assessment carried out on behalf of the applicant, it is our view that the development would lead to a significant material loss of light to important habitable room windows in existing neighbouring residential properties. Our client has commissioned a separate,

independent daylight and sunlight assessment to support their concerns. The findings of this assessment have been submitted under separate cover.

3. Our client is still awaiting additional information from the Zoo's light consultants subsequent to their own advisers' report: "With regards to the NSL results, we have requested the survey information obtained on site by Anstey Horne, so we can update our assessment to ensure that the NSL results are based on the most accurate information. Once we have this, we will be in a position to re-run the NSL results and submit the supplementary information for the officer to review." This information has been provided by Anstey Horne to the Zoo's light consultants.

4. We will not reproduce the findings of that report here. However, it is worth highlighting a number of critical deficiencies which must cast doubt on the validity of the applicant's daylight and sunlight assessment. In particular, we have found that the plan depth of numerous habitable rooms within the adjacent properties to be as much as 5.2m and not 4.0m as assumed in the applicant's assessment.

5. The consequences of this are significant and materially alter the outcome of any assessment under the BRE (Building Research Establishment) guidelines.

6. Having assessed the individual properties at 1-6 Northcote Road, it is clear that many internal living areas that were previously found to fall within acceptable limits in terms of the reduction in daylight and sunlight can now be shown to fall beyond those limits.

7. This demonstrates that the applicant's assessment does not provide an accurate or acceptable evidence base for the design and layout as proposed. On the contrary, the evidence shows that the proposal in its current form would breach the BRE guidelines on numerous counts, causing material harm in terms of a reduction in daylight and sunlight to important habitable rooms within neighbouring properties.

8. The recent Zoo response to the Case Officer and Anstey Horne report states that "it is important to note that the retained VSC levels to 78 (93%) of the 84 windows are at above 20% which is considered acceptable and shows that the rooms will remain with the potential to receive good levels of daylight." Factually, this statement is incorrect – their own data table in the appendix of the original daylight report identifies 22 windows with a retained VSC below 20%. This equates to 26.2% of all windows in the terrace and NOT the 2.4% implied by the suggestion that only 2 relevant windows out of the 84 windows were adversely affected. Elsewhere, it has been stated by the Zoo's consultants that "Essentially if a window remains with 27% visible sky it is considered to be well-lit".

9. There seems to be a consistent pattern of dismissive, casual conclusions and use of data to obscure the fact that there are significant losses of daylight and sunlight to the residents which even regardless of BRE guidance, harm the residential amenity unnecessarily when these could be mitigated with some appropriate adjustments in height or setback.

10. Such suggestions have been made and ignored. The client does not believe there has been sufficient "proactive and effective engagement with the (Northcote Rd) community" (NPPF) with regard to this important matter after the very early stages of consultation.

11. Furthermore, it should be noted that the BRE guidelines used to inform the daylight and sunlight assessment take no account of loss of outlook. This typically occurs where a development has an

oppressive or overbearing impact by reason of its size, scale, height, bulk and proximity to existing residential development. This critical matter must be assessed on its merits having regard to the relevant circumstances in each case.

12. Here, the excessive size, scale, height, bulk and massing of the proposed development in such close proximity is uncharacteristic of the conservation area and again exceeds acceptable limits.

13. The outlook from adjacent residential properties on all sides would be dominated by massive blocks up to five or 6 storeys in height, in close proximity and unalleviated by sufficient separation, setback and articulation to soften and relieve the built form.

14. Many residents currently enjoy a relatively unrestricted outlook out across the local area from their upper floor windows. The massive scale and height of the proposed development at such close proximity would utterly dominate and obliterate that outlook for almost all of the residents' primary living spaces. Combined with the material loss of light that would result from the development, the overall impact would be oppressive in the extreme and in no way consistent with the well-established characteristics of the local area where residential buildings are smaller than the proposed blocks and where housing setbacks and distances between directly opposing housing are very much greater (at least 28 metres and often more than 35metres)

15. We would add that the overall degree of enclosure resulting from the development would far exceed the general standards for the local area, especially for Northcote Rd - a point that is confirmed by the applicant's Townscape and Visual Impact Assessment. By virtue of their combination of height and close proximity to buildings directly opposite, blocks in this proposed development often exceed the "25 degrees rule" frequently used as proxy guidance for loss of sunlight and increased overshadowing. The adverse urbanising and enclosing effect of this development harms both the setting of the heritage assets and the amenities at existing residential properties.

16. In addition, the development would inevitably increase overlooking between the upper floor windows in the proposed and existing neighbouring residential properties. The overall impact would, in our judgement, be extremely overbearing and intrusive.

17. Taken as a whole, we find that the proposal fails to safeguard amenity and ensure appropriate levels of privacy, outlook and daylight for existing development, as required by Policy BCS21 of the Core Strategy, Development Management Policy DM27 and the relevant provisions of the Framework.

Conclusions

1. In conclusion, we cannot stress enough the need to appreciate the unique importance of this site, both to the local community and as an established, nationally recognised zoological facility. The development affects numerous designated heritage assets. Any loss of significance in this regard would be irreversible and, in national policy terms, requires special and over-riding justification.

2. We consider the degree of harm that would be caused in this cause would amount to 'substantial' harm, in the terms set out in the Framework. Approval in such cases should only be granted exceptionally where there is an over-riding justification in the public interest.

3. However, we have shown that this proposal would deliver either limited public benefits, or that the nature of those benefits need not preclude a more sensitive scheme, whereby the significance of the heritage assets could be better preserved for the benefit of existing and future generations.
4. The planning balance in such circumstances must weigh overwhelmingly against approval.
5. We have demonstrated that further significant harm would result to the amenities of existing neighbouring occupiers.
6. Furthermore, it is clear from our analysis and the evidence provided by local residents that the proposal is based on inaccurate, incomplete and unrepresentative evidence, which fails to correctly quantify and accurately or realistically depict the impact on the surrounding residential properties.
7. This only reinforces our firm view that this is an inadequately conceived and unsympathetic proposal which would grossly overdevelop this extremely sensitive and important site to the detriment of its character, appearance, heritage, setting and amenities.
8. The resulting development proposal contravenes important national and locally adopted development plan policies for the protection of local character, heritage and environmental quality, as set out in detail above.
9. We urge the Council to uphold those policies and refuse planning permission for the reasons stated.
10. Given the significance of these matters both in planning terms and for local residents, we formally request that the Members of the relevant planning committee arrange a site visit to enable Members to view the site and fully appreciate the true impact of the proposal before determining such an historic and sensitive application. We request that this visit includes walking along the Grand Parade within the Gardens and around the perimeter wall streets including Guthrie Rd, Northcote Rd and Clifton Down. For a site of such importance and sensitivity, this visit would benefit by being accompanied with accurate, unembellished scale images from a ground viewpoint in order to much better visualise the scale and potential impacts of this proposal on the heritage asset of the Gardens plus the likely adverse impacts on the wider Conservation Area and its residents. Our clients would also welcome visitation to some of the neighbouring affected residential properties so that they can better understand the loss of outlook and residential amenity.

Yours faithfully

Humphreys & Co.

Pollution Control 1 of 2

Date: 15th July 2022

I have no objection to this development but would just need to try to ensure that existing residents are not caused harm by the redevelopment of the site and that residents of the development are not caused harm by the community/commercial uses at the development. I am happy with the proposals made in the management plan submitted with the application regarding the community/public use areas.

I would therefore ask for the following conditions should the application be approved:

1. Construction Management Plan

No development shall take place until a site specific Construction Management Plan has been submitted to and approved in writing by the Council. The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting.

Advice

The Construction Environmental Management Plan should also include but is not limited to reference to the following:

All works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the Local Planning Authority, shall be carried out only between the following hours: 08 00 Hours and 18 00 Hours on Mondays to Fridays and 08 00 and 13 00 Hours on Saturdays and at no time on Sundays and Bank Holidays.

Mitigation measures as defined in BS 5528: Parts 1 and 2 : 2009 Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise disturbance from construction works.

Procedures for emergency deviation of the agreed working hours.

Control measures for dust and other air-borne pollutants .

Measures for controlling the use of site lighting whether required for safe working or for security purposes.

Procedures for maintaining good public relations including complaint management, public consultation and liaison.

2. Details of Kitchen Extraction/Ventilation System (Class E & Class F uses only)

No equipment for the extraction and dispersal of cooking smells/fumes shall be installed until details including method of construction, odour control measures, noise levels, appearance and ongoing maintenance have been submitted to and been approved in writing by the Local Planning Authority. The approved scheme shall be installed before the installation of any such equipment and thereafter shall be permanently retained.

Post commencement

3. Noise from plant & equipment affecting residential

The rating level of any noise generated by plant & equipment as part of the development shall be at least 5 dB below the pre-existing background level at any time at any residential premises.

Any assessments to be carried out and be in accordance with BS4142: 2014+A1:2019 Methods for rating and assessing industrial and commercial sound

4. Use of Refuse and Recycling facilities (Class E & Class F uses only)

Activities relating to the collection of refuse and recyclables and the tipping of empty bottles into external receptacles shall only take place between 08.00 and 20.00 Monday to Saturday and not at all on Sundays or Bank Holidays.

5. Opening hours (Class E & Class F uses only)

As detailed in the application I would ask that these be restricted to 07.30 to 22.30

Mark Curtis

Pollution Control Team

Bristol City Council

Pollution Control 2 of 2

Date: 6th December 2022

Following the submission of further documents regarding this application, including a noise assessment and comments in the planning statement regarding Clifton College Music School I would comment further on noise as follows: I am happy with the noise assessment and would agree that if 'the mitigation measures and design requirements outlined in this report are implemented, the development will meet the requirements of National and Local Policy'. The noise assessment does not however make any

assessment of noise from Clifton College Music School. Noise from the school is mentioned in the planning statement which finds that based on a number of assumptions finds that noise from the school should not be an issue or can be suitably mitigated against. I would agree with this but as this is largely based on assumptions and probabilities, I do feel that further information will be required by condition. I would therefore ask for the condition below should the application be approved. 1. Sound insulation of residential properties from external noise All recommendation detailed in the Noise Assessment submitted with the application with regards to sound insulation and ventilation of residential properties shall be implemented in full prior to the commencement of the use permitted and be permanently maintained. 2. Assessment of noise from Clifton College Music School. No commencement of use shall take place until a noise risk assessment, in accordance with ProPG: Planning & Noise Professional Practice Guidance on Planning & Noise New Residential Development (May 2017), has been submitted to and approved in writing by the Council. The assessment should take into account noise from Clifton College School including the Joseph Cooper Music School. The noise assessment shall be carried out by a suitably qualified acoustic consultant/engineer and, if necessary, shall include a scheme of noise insulation measures. Any approved scheme of insulation measures shall be implemented prior to the commencement of the use and be permanently maintained thereafter.

Public Art Team

Date: 13th December 2022

In general I'm in support of the updated cultural strategy and approach as submitted by Gingko in line with the altered proposals

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

The following condition is advised in the event of approval: In accordance with the submitted Outline Public Art and Culture Strategy, and prior to commencement of the development, further details of the Public Art commission(s), including a timetable for implementation, shall be submitted to and approved in writing by the Local Planning Authority in an updated Public Art and Culture Strategy. The public art works shall be implemented and completed in accordance with the approved details, unless otherwise agreed in writing by the Local planning Authority.

Reason: To ensure the delivery of Public Art and Culture throughout the development and to allow for successful integration into the design and build process where relevant

Save Bristol Zoo Gardens

Date: February 2022

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

Change of Use not justified

The Campaign has enlisted the support of accountants and a former Zoo Director who have confirmed that there is no reason the 186 year old site should not continue in business as a successful visitor attraction. Income, profitability and visitor numbers had all been positive in the

decade preceding 2020 and all showed sign of recovery to their pre-Covid levels prior to the Zoo's closure. The picture of the Clifton site as an inevitable failure is false and the decision to sell all their property in Clifton was taken to provide capital funds for their Wild Place Project in Gloucestershire.

Both Local Plan policy DM5 and Core Strategy Policy BCS12 make direct reference to the fact that the loss of Community Facilities will not be permitted unless it can be clearly demonstrated that there is no longer a demand for the facility or that the building/s are no longer suitable to accommodate the use and the building cannot be retained or adapted to another community use. Furthermore Policy DM5 goes on to state that the loss of a community facility will only be acceptable if a replacement facility can be provided in 'a suitable alternative location'. The Zoo's own figures indicate that there is still a continuing demand and zoo keepers and zoologists confirm that the site is suitable for certain species of animal. Many alternative community uses have been proposed, ranging from a city farm to an Eden Project style gardens. Sufficient time has not been given to explore these possibilities or their funding. The Wild Place is not a suitable alternative location, requiring car transport, whereas a city zoo is easily accessed by public transport, bicycle or on foot.

Ecology and Sustainability

The Bristol Tree Forum has already challenged the Zoo's claim of a 38% increase in biodiversity as it is based on outdated methodology. They estimate the outcome to be a 22% net loss. The loss of trees is excessive and experts fear for the remainder when surrounded by building works and then by tall buildings. The proposal to plant '2 for 1' is less than the Council's Tree Replacement Standard.

Demolition and rebuilding is not the preferred approach by RIBA due to the loss of embodied energy in demolition and the carbon cost on construction materials. A Bristol environment expert supporting the Campaign estimates the carbon cost of the construction proposed on the site would be equivalent to running the existing buildings for 2500 years. Adaptation or reuse is to be preferred.

Public amenity

The proposed public access and maintenance of the gardens is to be funded by a levy on the residents. But there is insufficient evidence that this right will be granted in perpetuity as this access is permissive and could be modified or withdrawn. It is the prediction of many objectors to his scheme that the residents will object to funding a public amenity and in time it will become a private space.

The scheme provides no long term protection of public access. This could be provided by the dedication of the site for public access in perpetuity under section 16 of the Countryside and Rights of Way Act 2000, which would be binding on subsequent owners. Alternatively, designation as a town or village green. The Zoo could apply for voluntary registration under the Commons Act 2006

Harm to overall historic interest and significance of site

The May 2022 Heritage Statement acknowledged the harm that is caused to the site and Conservation Area through the departure of the Zoo from its historic home, a point echoed by Historic England. The SBZG disagrees that this harm is justified by the current proposal. The

significance and irreplaceability of the site as a whole is fundamental to this application. Bristol Zoo Gardens is the oldest one in the UK and the fifth oldest in the world. It has been open for 186 years. NPPF 189 states: 'These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'.

Loss of Communal Value

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

Harm to listed buildings

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

Justification of harm

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

Alternatives

Other proposals for the site have been put forward either in broad outline or in detail and this suggests that other schemes are possible. Covid has provided a distraction so that disposal of the site is presented as a finished decision. But this is a nationally important site and time could usefully be taken to allow further time for ideas or to run a competition to determine its future. The Campaign's preference is that it reopens as 'a Zoo fit for the 21st century' which was the Zoo's strategy up to 2020.

Design

Even if there were no alternative to building densely on the site, the proposal is a homogeneous scheme that does not respond to the architectural character and appearance of this part of the Conservation Area, which is predominantly large detached and semi-detached villas alongside imposing educational buildings situated within a verdant landscape and tree-lined avenues. The scale of development within the southern end of the site would be over-intensive with a consequential poor relationship with the adjacent school and its listed buildings. The north building

at six storeys is an unrelenting monolithic block that does not respond to the character and appearance of the area. The relationship between the existing listed buildings and the scale and location of proposed development is extremely poor, in particular the Bear Pit would be overly dominated by new development.

Landscape

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

Cars and Parking

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

SAVE Bristol Zoo Gardens Campaign

February 2022

Sustainable City Team (BCC) 1 of 3

Date 15th July 2022

Core strategy policies relating to sustainability include BCS13-16. In addition, BCS10 (Transport and Access) also has relevance to sustainability.

The relevant Site allocations and development management policies supporting the core strategy policies in relation to sustainability are: DM15, DM17, DM19, DM29.

Full technical guidance on how to implement the above policies can be found within Bristol City Council's Climate Change and Sustainability Practice note.

1. Sustainable City comments

Overall, the proposals are well aligned to the objectives of BCC sustainability planning policy. However, we request further information around some elements of the heating system as detailed below.

BCS13 – Climate Change

Overheating modelling shows overall a good level of resilience to overheating under future weather scenarios. Though some risk is identified in 2050 and 2080 this can be mitigated with increased window opening.

Cycle parking, EV charging, and car club provision are all proposed in line with policy to support more sustainable transport options.

Extensive green infrastructure is proposed to improve biodiversity of the site, alongside a range natural water management features. There is a strong focus on multi-functional benefits of

landscaping.

BCS14 - Energy

Very good U-values and air tightness are proposed with high efficiency LED lighting and MVHR with summer bypass throughout. Fabric improvements and connection to the local heat network are proposed for all existing buildings that are to be refurbished for dwellings.

The overall heat strategy is well considered and the use of different heat pump sources to feed a local low temperature network offers a low carbon approach that is supported. However, electric boilers are proposed for back up and to meet peak heat demand in the coldest months. Though we would accept these in place for back up alone, their usage for peak heat provision is problematic as direct electric heating is not compliant with the heat hierarchy set out in BCS14.

Though we note that they are only anticipated to provide 0.2% of heat demand and recognise they are considered preferable to gas, we would like to see some further information around the following:

- Explanation as to why low carbon heat sources can't be increased to meet the full heat demand.
- Has heat demand been calculated based on SAP alone? Though we currently recommend the use of SAP for energy calculations, the methodology is known to underestimate heat demand so there is a risk that the boilers may be used more than predicted.
- Could connection to the heat network to meet peak demand in the future be explored?
- Though there are no current networks in the area, it is likely there will be in future.

Extensive PV is proposed and will well exceed the 20% renewables target. More information on the PV will be required at a later stage.

BCS 15 Sustainable design and construction

A BREEAM communities scoping assessment has been undertaken as required, and all BCC recommended credits and some additional credits deemed to be relevant. The development meets the principles set out for the relevant credits. This demonstrates that wider sustainability principles are being considered across the project.

We are pleased to see that a structural embodied carbon assessment has been undertaken to inform early design choices. A target 'grade E' SCORS rating has been set and not all areas are anticipated to meet the target based on current plans. As this appears to be a relatively low target, we recommend that all the measures identified to improve performance are implemented if feasible at detailed design stage.

We welcome the commitment to reduce mains water consumption and the target of 95/l/day.

2. Recommended conditions

If/when permission is granted, we anticipate conditions will be required in relation to:

- Energy and sustainability in accordance with approved statement
- PV
- Heat pumps
- Air tightness

Sustainable City Team (BCC) 2 of 3

Date: 15th December 2022

Core strategy policies relating to sustainability include BCS13-16. In addition, BCS10 (Transport and Access) also has relevance to sustainability.

The relevant Site allocations and development management policies supporting the core strategy policies in relation to sustainability are: DM15, DM17, DM19, DM29.

Full technical guidance on how to implement the above policies can be found within Bristol City Council's Climate Change and Sustainability Practice note.

1. Sustainable City comments

Further to initial comments provided in July:

Detailed SAP outputs are provided for a sample of dwellings at each stage of the energy hierarchy. Additional energy data has now been provided showing summary figures for each residential block. This methodology is as required under BCS14.

As SAP 2012 carbon factors were in use for Part L 2013 at the time of the initial submission, the use of these carbon factors has been continued for the revised statement (rather than Part L 2021). For the purpose of BCS14 calculations we consider this to be acceptable.

We have some queries in relation to the figures provided and request that further information is provided on:

- Detailed calculations of how the carbon emissions figure (kgCO₂pa) are derived from the energy demand (kWhpa) in the summary table, including a breakdown of fuel type (e.g. gas, electricity, district heating etc) and carbon emission factor used at each stage of the energy hierarchy.
- 'Appendix B6 – SAP model calculation outputs for each residential block' provides a total CO₂ figure of 191,042kg PA but 194,594kg PA is shown in the summary table – we request that this be clarified.
- The DER worksheets provided after residual measures for dwellings E1_30_sw_g and LH_85_n_1 do not align with the corresponding figures shown in the summary for each residential block.
- The 3 sample dwelling SAP outputs provided all show a carbon saving from PV that is lower than the 32% stated in the summary tables. We note that there is wide variation in the levels of PV provided on different buildings and request that SAP outputs are provided for further sample dwellings from more blocks including those with both high and low levels of PV proposed.

ACTION: Points to be addressed in an addendum or revised energy strategy.

Further information regarding the use of electric boilers was provided by the applicant team in June 2022. This states that increasing the number and/or size of the heat pumps to meet the peak demand would add significant building mass and mean the loss of PV and green roof area. The peak demand figure has been calculated using CIBSE heat network code of practice methodology. This is considered acceptable, we have no further objection to the use of electric boilers in this instance given the small proportion of demand and the usage as part of a low carbon site wide heat network.

Notwithstanding the queries above related to the energy data, the proposed measures appear in full

compliance with the objectives of BCS14:

- Good practice levels of energy efficiency are proposed, improving on Building Regulation standards to minimise energy demand.
- In accordance with the heat hierarchy, a site-wide district heating network is proposed with over 99% of heat to be provided by heat pumps. Though heat networks are treated as an energy efficiency measure for the purpose of BCS14, heat pumps are considered a renewable technology. Therefore, although in the energy calculations only PV is counted towards the carbon reduction from renewables, in fact the renewable energy generation on site is greater than is illustrated by this figure.
- Extensive PV is proposed across the suitable roof space to further reduce carbon dioxide emissions from residual energy use.

BCS15 – sustainable design and construction

Whilst we welcome the embodied carbon assessment provided, we reiterate our previous point that the targets set are not stretching and do not align with established industry good practice. BCC's new draft local plan policies have now been published for consultation and, if adopted, new development will be expected to achieve the following targets for embodied carbon:

- Residential (4 storeys or fewer) - <625 kgCO₂e/m²
- Residential (5 storeys or greater) - <800 kgCO₂e/m²

We note that further efforts will be taken at detailed design stage to reduce embodied carbon and strongly recommend that the development aims towards the targets highlighted above. However, as no embodied carbon targets are set in adopted policy, we do not consider this to be a compliance issue.

The requirements of BCS15 are met in other areas including good practice targets for water efficiency, an extensive sustainable drainage plan, provision of biodiverse green roofs, and specific targets in relation to waste and responsible sourcing of materials.

Sustainable City Team (BCC) 3 of 3

Date: 17.01.2023

The recently submitted information addresses the concerns raised in the Sustainable City Team's previous comments

The Victorian Society 1 of 2

Date: 22nd July 2022

Dear Case Officer,

RE: 22/02889/LA | Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure. Works to listed building including: access-works to the Guthrie Road entrance gates; the conversion of the Entrance Lodge to facilitate community floorspace, the residential conversion of the Giraffe House, and various restoration and refurbishment works to the Aquarium (former Bear Pit), Monkey Temple, and Birds of

Prey Aviary to secure their future as part of accessible landscaped gardens. | Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

Thank you for consulting the Victorian Society on this application. It was presented to the Society's Southern Buildings Committee, a group of architects, historians and heritage professionals. Following its advice we write to make this objection.

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

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

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

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

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

The NPPF is clear that it is desirable to 'sustain and enhance' the significance of heritage assets (para 190a), and that 'great weight should be given to the asset's conservation' (para 199). Furthermore, that 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their

significance.’ (para 206). This proposal would not enhance or better reveal the significance of the site and nearby heritage assets. The Victorian Society objects to the proposal in its current form.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

Connor McNeill

Conservation Adviser

The Victorian Society 2 of 2

Date: 27th January 2023

Thank you for consulting the Victorian Society on amendments to the original proposals for the redevelopment of Bristol Zoological Gardens. However, having reviewed the latest documentation our objection remains. In our previous objection we drew attention to the site’s high significance as one of Europe’s earliest zoological gardens, and one which continues in this use. Furthermore, we highlighted the important role it plays in contributing to the significance of the Clifton Conservation Area and the setting of nearby designated and non-designated heritage assets. The proposals which would see the site adapted to a new use, with a quantum of development alien to the character of the site and the Conservation Area, would cause serious harm to significance as outlined in our previous consultation response. The amendments which comprise of minor design changes do not address these concerns and the proposals remain substantially as first presented. Our serious concerns about the harm the scheme would cause to the significance of the site, Conservation Area and nearby designated and non-designated assets remain. The NPPF is clear that it is desirable to ‘sustain and enhance’ the significance of heritage assets (para 190a), and that ‘great weight should be given to the asset’s conservation’ (para 199). Furthermore, that ‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.’ (para 206). The amended proposals do not ensure this, and the Victorian Society maintains its objection to the proposals. Connor McNeill Conservation Adviser Direct line 020 8747 5893 connor@victoriansociety.org.uk Your reference: 22/02737/F Our reference: 180526 26th January 2023 development.management@bristol.gov.uk I would be grateful if you could inform me of your decision in due course.

Yours sincerely, Connor McNeill Conservation Adviser

Transport Development Management 1 of 3

Date: 15th August 2022

TDM Summary

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

TDM support the application because:

- The proposed development is consistent with national and local transport policy.
- The location of the site is accessible to pedestrians, cyclists, and public transport users.
- Site permeability to pedestrians also integrates the site with the surrounding pedestrian routes.
- Access to services, education and employment areas are within walking and cycling distance of the site, which is in line with local and national policies
- Satisfactory vehicular access can be achieved from College Road, Guthrie Road and Northcote Road. The provision of three vehicle access points distributes vehicles both around the site and local road network to minimise traffic impact. The details of which will be subject to S278 agreement.
- The internal site layout is able cater for all road users including service vehicles as shown

by swept path analysis.

- The level of car parking proposed is suitable for the location of the site given that local facilities are accessible by foot, cycle, and public transport, and that on-street parking is controlled by a residents parking zone for which new residents would not be able to purchase permits.
- The sustainable travel measures proposed including secure cycle parking in excess of the minimum standards, car club car, and the implementation of a Travel Plan at the site further would encourage the use of alternative modes of transport to the private car, reducing car parking demand.
- Comparing average traffic generation, the proposed traffic generation of the development would be less than the existing BZG traffic generation therefore there is a net traffic benefit of the scheme compared to the existing use of the site. This would also be the case when considering the cumulative impact of both the residential schemes at West Car Park and BZG.
- The proposed scheme would generate substantially lower levels of traffic than from the BZG use on peak BZG visitor days.
- There are no road safety concern on the local road network and there is no reason to suggest that that proposal would affect this situation.

The obligations and conditions

The obligations requested are considered required and meet the CIL Regulations 122 test, in that it would be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development

Obligations

- The extent and scope of the S278/ S38
- Contributions of £220 per residential unit for travel plan delivery and management or £5,693 where applicant will do their own delivery
- Contribution for road safety and sustainable transport improvements within 500m of the site £1,000 per unit. (£196,000)

Pre commencement conditions

B1B Approval of road works necessary

B38 Construction Management Plan – Major Developments

C. Pre occupation conditions

C7A Completion of Vehicular Access – Shown on Approved Plans

C8 Completion of Pedestrians/Cyclists Access – Shown

C35 Car Club

C36 Electric Vehicle Charging Points

File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments - Second\22.02737.F bristol zoo draft tDM comments rev.docx22/02737.F Bristol Zoo

TDM Assessment details

The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.

Officers have reviewed this application and identified the following areas for detailed comments:

- Road network - Access and Road Safety – The safe movement of all modes entering and exiting the public highway
- Trip Generation –The existing and proposed trips related to the site
- Active Transport – Walking and cycling and behaviour change
- Public Transport – Current access and future potential
- Servicing and Delivery – How the development will manage the vehicular trips required
- Car Parking - How the development will manage the vehicular trips required

Location

The site is bounded by the BZG North Car Park to the north west (with the A4176 Clifton Down beyond), Northcote Road to the north east, Guthrie Road to the south east, and College Road to the south west.

Constraints

- The BZG North Car Park on land controlled by the Downs Committee to the north west. The Downs Committee made clear that they would not support any motorised vehicle access to the proposed development that would impact on the existing layout.
- Northcote Road is one way northbound

Road Network

Strategic

The strategic route for motorised vehicles access connects:

- A4176 Clifton Down from the A4 Portway around 1km to the south west to the A4018, 1km to the north east. The A4018 continues north to the M5 junction 17 around 7km north of the site. To the south the A4018 continues into Bristol city centre around 2.5km to the south.
- A4176 signal junction with the A4 Portway some 1km to the south west of the site, the A4 continues north for some 8km to Avonmouth and the M5 junction 18A and south east some 3km into Bristol city centre.

Local Roads

- Northcote Road is a one way road northbound along the eastern boundary of BZG. continues north east to meet The Avenue at a priority junction immediately east of the BZG North Car Park. The Avenue meets Clifton Down 20m further north at a priority junction. To the south The Avenue continues approximately 290m to meet Guthrie Road at a priority junction.
- College Road bounds the site from junction with the A4176 Clifton Down to junction with Guthrie Road at a priority junction immediately north west of the site.. College Road also has a junction with Cecil Road junctions some 160m and 250 south east of Clifton Down respectively Raised tables are provided at both junctions. A right turn lane is provided on Clifton Down for around three cars to be able to wait to turn right into College Road
- Guthrie Road forms the southern boundary from junction with College Road, to junction with Northcote Road 180m east of College Road. Guthrie Road continues north east to Pembroke Road a further 170m north east.there are traffic calming measures - road narrowings and raised tables.

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Speed Limit

A 30mph speed limit is in place on the A4176 Clifton Down, with 20mph speed limits in place on College Road, Guthrie Road, Northcote Road, and other streets to the south, east, and west of the site.

Road Traffic casualty assessment

The TS showed evidence covering a five year period January 2016 to December 2020 inclusive. Roads included in the review are the A4176 from Ladies Mile/Clifton Down junction to Pembroke

Road, College Road from A4176 to Guthrie Road, and the full length of Guthrie Road and Northcote Road.

- One slight accident occurred at the College Road junction with the A4176 Clifton Down to the north of the site with a car on College Road overshooting the junction and into the path of a vehicle travelling south west bound on the A4176.
- One slight accident occurred on the A4174 at the BZG car park exit where a vehicle leaving the car park hit a pedestrian walking along the footway on the A4174.
- Two slight accidents occurred at the A4176 junction with Ladies Mile and Clifton Down triangle some 150m to the west of the site,
- One slight accident was recorded on Guthrie Road, between the Northcote Road and The Avenue junctions.
- Three slight accidents, occurred at the A4174 junction with Pembroke Road.

Proposed changes to the public highway

The changes to the public highway will be subject to the S278 works which will include but are not restricted to the following:

- Extension to the raise table at the College Road/Cecil Road junction to include the proposed site access;
- Kerb build out at the northern end of Northcote Road to allow for the vehicle access and pedestrian crossing;
- Kerb build out at the southern end of Northcote Road to allow for pedestrian access and crossing.

Active Transport

Walking

The site is surrounded by prestige walking routes that access public transport, retail and leisure. A recent active travel survey was undertaken on 3rd March 2021. This identifies the good walking connections of the site but also sets out where the gaps are:

- Footways are provided adjacent to all roads in the vicinity of the site, with the exception of short sections on either side of College Road on the approach to the A4176 Clifton Down, on Northcote Road not along the perimeter wall of the BZG site on the western side of the road.
- A Puffin crossing is provided across the A4176 Clifton Down approximately 50m to the north east of the College Road junction. a footpath which continues across Clifton Downs to the north.
- On College Road a Zebra crossing is provided some 70m south of the junction with the A4176 Clifton Down.
- An uncontrolled pedestrian crossing with central island is also provided across College Road at the junction with Clifton Down.
- Tactile paving and dropped kerbs are provided at junctions to the south of the site, including the Guthrie Road junctions with College Road and Northcote Road.
- Three uncontrolled crossing points are provided on Guthrie Road with road narrowings, raised tables and tactile paving provided.

Example of the easy connectivity to retail;

- Alma Vale Road is some 600m to the east of the site with a mix of shops including the Clifton Mini Market convenience store, restaurants and cafes provided.
- The centre of Clifton Village is around 900m to the south of the site with a range of high end retail establishments, restaurants, and cafes. Co-op and Tesco Express convenience stores are also provided, along with a Post Office and pharmacy.
- Whiteladies Road is approximately 1km to the east of the site with a range of retail, restaurants and cafes provided.

Internal Layout

The provision of three vehicle access points and vehicle turning areas around the site aims to distribute vehicles around the site and minimise the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow vehicle speeds through the space and encourage free flow of pedestrian and cycle movement.

Cycling

There are no on-road or off-road cycle routes in the immediate vicinity of the site. However 135m from the western corner of the site a shared footway/cycleway is provided along the A4176 Bridge Valley Road, which in turn connects to the A4 Portway shared footway/cycleway some 1km to the west, providing a traffic free cycle route between Bristol city centre and Avonmouth.

Cycle Parking

A total of 380 secure resident cycle parking spaces are proposed for the apartments, with each cycle store containing sufficient parking to provide at least one cycle space per bedroom of the associated apartment building. 40 cycle spaces will be provided for visitors. This is an acceptable quantum.

Public Transport

Bus

Bus stops are located on the A4176 Clifton Down immediately north of BZG, with the southbound stop just north of the junction with College Road, and the northbound stop a further 40m to the north east. The bus stops are equipped with real time information, shelters and timetables. The southbound stop is served by bus services 8 and 505 and the northbound stop by bus service 505. There are 7 further

Train

Clifton Down train station is around 1km to the east of the site. Destinations served from this railway station include Bristol Temple Meads, Weston-Super-Mare and local stations of Redland, Montpellier, Lawrence Hill, Avonmouth and Severn Beach. Connecting services to destinations across the country are also provided from Bristol Temple Meads including London, Birmingham, Cardiff and Exeter and beyond. During the day Monday to Saturday services operate around every 30 minutes in both directions between Avonmouth and Bristol Temple Meads, continuing to/from Severn Beach and Weston-Super-Mare every hour. In the evening services operate every 30- 60 minutes from Temple Meads to Severn Beach. On Sunday an hourly service is provided between Bristol Temple Meads and Severn Beach.

Trip Generation

The Zoo generally attracted more Weekend vehicle than the weekday. Events are also more frequent on weekends.

The analysis looked a differentiating between staff and visitor trips the average week

Daily 24 Hour -

Weekday BZG &

Associated Uses

Vehicle Traffic

Arrivals Departures Two-way

Generation

BZG Staff 81 81 162

BZG Visitors 288 288 576

Clifton Pavilion Visitors 129 129 258

Hide Visitors 94 94 188

Education Centre 33 33 66

Total 625 625 1250

Car Parking

The area around the site forms part of the Bristol Residents' Parking Scheme (RPS). On a number of the roads within the vicinity of BZG including College Road, Cecil Road, and Guthrie Road many of the bays are shared permit holder and pay and display use bays. Vehicles can park either with a permit or for a maximum of five hours using the pay and display bays Monday to Friday 09.00-17.00. Immediately adjacent to the site on Cecil Road permit holder only bays are provided also operating Monday to Friday 09.00-17.00. No restrictions are in place in the evening and during weekends.

The results of on-street parking surveys undertaken on:

Thursday 25th February 2021 at 20.0

Road No. of Cars Parked No. of Spaces Not Occupied

College Road (Clifton Down to

Guthrie Road

18 17

Guthrie Road (full length) 30 23

Northcote Road (full length) 17 44

Total 65 84

Wednesday 1st December 2021 at 20.00.

Road No. of Cars Parked No. of Spaces Not Occupied

College Road (Clifton Down to

Guthrie Road

32 52

Guthrie Road (full length) 7 35

Northcote Road (full length) 17 9

Cecil Road (full length) 12 26

College Fields (full length) 23 28

Clifton Down triangle east (full length

6 23

Clifton Down triangle south (full length)

0 30

Canynge Road (full length) 30 36

Total 127 239

Car Club

The application provides 1 car club and the provision of parking for this exact location to be linked to S278 process with the possibility of it being an electric car club car, subject to being able to achieve a charging point on street.

Internal parking management

The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan will be required to detail how this will be managed.

Travel Planning

The obligation contribution will be prioritised for reducing car dependency and the road safety of new residents and the relationship with Clifton College.

Construction Management

The construction management plan will be expected to demonstrate consideration of Clifton

College when managing the construction trips related to the site.

C. Pre occupation conditions

C7A Completion of Vehicular Access – Shown on Approved Plans

C8 Completion of Pedestrians/Cyclists Access – Shown

C35 Car Club

C36 Electric Vehicle Charging Points

Advices

I021A) Alterations to Vehicular Access

I023A) Oversailing

I024A) Works on the Public Highway

I025A) Minor works on the Public Highway

I026A) Traffic Regulation Order (TRO)

I027A) Highway to be Adopted

I028A) Public Right of Way

I043A) Impact on the highway network during construction

I044A) Restriction of Parking Permits – Existing Controlled Parking Zone/Residents Parking Scheme

I045A) Restriction of Parking Permits – Future Controlled Parking Zone/Residents Parking Scheme

I046A) New driveway in a Residents Parking Scheme or a Proposed Parking Scheme

I052) Highway Condition Survey

I053) Excavation Works on the Adopted Highway

I054) Private Road

I055) Street Name and Numbering

I056) Stopping Up/Diversion of Adopted Highway

I057) Stopping or Diverting a Public Right Of Way

I058) Sustainable Drainage System (SUDS)

TDM Response to transport related objections from consultees of the most recent consultation.

Re: Historic England

The evidence provided by the applicant shows the trips to the site will be significantly lower than it was as a zoo. (this is in comparison between servicing and delivery trips related to the Zoo site in operation against the proposed residential site not including the offsite visitor carparking).

To mitigate for the trip level for the new site the applicant will be contributing S106 for road safety and sustainable transport improvements in the vicinity of the site.

They are also contributing S106 for travel planning will be used to promote safer and sustainable travel by the future residents to discourage private car ownership.

All of the changes impacting the highway will be subject to safety audits and adjustments will be able to be made within the S278 works.

Officers therefore are satisfied any concerns can be satisfactorily mitigated for.

Clifton College

TDM officers have reviewed the concerns of Clifton College and feel there is no new concern that wasn't addressed previously by the applicant.

The internal streets have been designed to provide a liveable neighbourhood taking into account the needs of pedestrians and disabled users moving around the site.

The provision of three vehicle access points and vehicle turning areas around the site minimises the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow

vehicle speeds through the space and encourage free flow of pedestrian and cycle movement. The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan will be required to detail how this will be managed.

To mitigate for the any road safety concerns for the new site the applicant will be contributing S106 for road safety and sustainable transport improvements in the vicinity of the site.

They are also contributing S106 for travel planning will be used to promote safer and sustainable travel by the future residents to discourage private car ownership and the road safety relationship with the school

All of the changes impacting the highway will be subject to safety audits and adjustments will be able to be made within the S278 works.

Officers therefore are satisfied any concerns can be satisfactorily mitigated for.

Transport Development Management 2 of 3

Date: 13th October 2022

TDM Summary

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

TDM support the application because:

- The proposed development is consistent with national and local transport policy.
- The location of the site is accessible to pedestrians, cyclists, and public transport users.
- Site permeability to pedestrians also integrates the site with the surrounding pedestrian routes.
- Access to services, education and employment areas are within walking and cycling distance of the site, which is in line with local and national policies
- Satisfactory vehicular access can be achieved from College Road, Guthrie Road and Northcote Road. The provision of three vehicle access points distributes vehicles both around the site and local road network to minimise traffic impact. The details of which will be subject to S278 agreement.
- The internal site layout is able cater for all road users including service vehicles as shown by swept path analysis.
- The level of car parking proposed is suitable for the location of the site given that local facilities are accessible by foot, cycle, and public transport, and that on-street parking is controlled by a residents parking zone for which new residents would not be able to purchase permits.
- The sustainable travel measures proposed including secure cycle parking in excess of the minimum standards, car club car, and the implementation of a Travel Plan at the site further would encourage the use of alternative modes of transport to the private car, File Name: S:\PLAN\Officers\Matthew\ Applications\Zoo\Full\Comments\TDM Comments.docx22/02737.F Bristol Zoo reducing car parking demand.
- Comparing average traffic generation, the proposed traffic generation of the development would be less than the existing BZG traffic generation therefore there is a net traffic benefit of the scheme compared to the existing use of the site. This would also be the case when considering the cumulative impact of both the residential schemes at West Car Park and BZG.
- The proposed scheme would generate substantially lower levels of traffic than from the BZG use on peak BZG visitor days.

- There are no road safety concern on the local road network and there is no reason to suggest that that proposal would affect this situation.

The obligations and conditions

The obligations requested are considered required and meet the CIL Regulations 122 test, in that it would be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development

Obligations

- The extent and scope of the S278/ S38
- Contributions of £220 per residential unit for travel plan delivery and management or £5,693 where applicant will do their own delivery
- Contribution for road safety and sustainable transport improvements within 500m of the site £1,000 per unit. (£210,000)

Pre commencement conditions

B1B Approval of road works necessary

B38 Construction Management Plan – Major Developments

C. Pre occupation conditions

C7A Completion of Vehicular Access – Shown on Approved Plans

C8 Completion of Pedestrians/Cyclists Access – Shown

C35 Car Club

C36 Electric Vehicle Charging Points

File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments\TDM

Comments.docx22/02737.F Bristol Zoo

TDM Assessment details

The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.

Officers have reviewed this application and identified the following areas for detailed comments:

- Road network - Access and Road Safety – The safe movement of all modes entering and exiting the public highway
- Trip Generation –The existing and proposed trips related to the site
- Active Transport – Walking and cycling and behaviour change
- Public Transport – Current access and future potential
- Servicing and Delivery – How the development will manage the vehicular trips required
- Car Parking - How the development will manage the vehicular trips required

Location

The site is bounded by the BZG North Car Park to the north west (with the A4176 Clifton Down beyond), Northcote Road to the north east, Guthrie Road to the south east, and College Road to the south west.

Constraints

- The BZG North Car Park on land controlled by the Downs Committee to the north west. The Downs Committee made clear that they would not support any motorised vehicle access to the proposed development that would impact on the existing layout.
- Northcote Road is one way northbound

Road Network

Strategic

The strategic route for motorised vehicles access connects:

- A4176 Clifton Down from the A4 Portway around 1km to the south west to the A4018, 1km to the north east. The A4018 continues north to the M5 junction 17 around 7km north of the site. To the south the A4018 continues into Bristol city centre around 2.5km to the south.
- A4176 signal junction with the A4 Portway some 1km to the south west of the site, the A4 continues north for some 8km to Avonmouth and the M5 junction 18A and south east some 3km into Bristol city centre.

Local Roads

- Northcote Road is a one way road northbound along the eastern boundary of BZG. continues north east to meet The Avenue at a priority junction immediately east of the BZG North Car Park. The Avenue meets Clifton Down 20m further north at a priority junction. To the south The Avenue continues approximately 290m to meet Guthrie Road at a priority junction.
- College Road bounds the site from junction with the A4176 Clifton Down to junction with Guthrie Road at a priority junction immediately north west of the site.. College Road also has a junction with Cecil Road junctions some 160m and 250 south east of Clifton Down respectively Raised tables are provided at both junctions. A right turn lane is provided on Clifton Down for around three cars to be able to wait to turn right into College Road
- Guthrie Road forms the southern boundary from junction with College Road, to junction with Northcote Road 180m east of College Road. Guthrie Road continues north east to Pembroke Road a further 170m north east. There are traffic calming measures - road narrowings and raised tables.

Speed Limit

A 30mph speed limit is in place on the A4176 Clifton Down, with 20mph speed limits in place on College Road, Guthrie Road, Northcote Road, and other streets to the south, east, and west of the site.

Road Traffic casualty assessment

The TS showed evidence covering a five year period January 2016 to December 2020 inclusive. Roads included in the review are the A4176 from Ladies Mile/Clifton Down junction to Pembroke Road, College Road from A4176 to Guthrie Road, and the full length of Guthrie Road and Northcote Road.

- One slight accident occurred at the College Road junction with the A4176 Clifton Down to the north of the site with a car on College Road overshooting the junction and into the path of a vehicle travelling south west bound on the A4176.
- One slight accident occurred on the A4174 at the BZG car park exit where a vehicle leaving the car park hit a pedestrian walking along the footway on the A4174.
- Two slight accidents occurred at the A4176 junction with Ladies Mile and Clifton Down triangle some 150m to the west of the site,
- One slight accident was recorded on Guthrie Road, between the Northcote Road and The Avenue junctions.
- Three slight accidents, occurred at the A4174 junction with Pembroke Road.

Proposed changes to the public highway

The changes to the public highway will be subject to the S278 works which will include but are not restricted to the following:

- Extension to the raise table at the College Road/Cecil Road junction to include the proposed site access;
- Kerb build out at the northern end of Northcote Road to allow for the vehicle access and pedestrian crossing;

- Kerb build out at the southern end of Northcote Road to allow for pedestrian access and crossing.

Road Safety

The College buildings are spread across an area that is intersected by six different roads. The pupils range from nursery to 18 and the pupils in the senior school have to move around the local public highway network to those various buildings. Therefore road safety is paramount.

The road network around the college has been subject to a series of safer routes to school measures and there are parking controls operating in the area to enforce the kerbside. The new development will not be eligible to apply for parking permits.

The trip generation for the site is significantly reduced from the existing use.

All the works impacting on the highway have had initial safety reviews and will be subject to further safety audits as the scheme progresses. This process is linked to the S106 obligation for the developer to enter into a section 278 agreement.

The construction period would likely have heavier freight movement and that is why there is a condition attached for the detailed version of the CEMP. We can ensure that Clifton College are consulted by the applicant before the submit the document for discharge and as neighbours to the site they will be able to see and respond the application to discharge that condition. Time controls on peak school time can be applied at that time.

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TDM also think it reasonable to allocate some of the travel plan contribution to road safety education for Clifton college to enable pedestrian and cycle training to take into account the changes on the public highway.

The S278 works can also be used to enhance any of the existing school safety infrastructure on the surrounding highway identified in the safety audits when the developer goes into contract prior to commencement.

It is therefore TDM's position that supporting the proposal subject to the obligations and conditions requested would enable all road safety concerns raised to be addressed.

Active Transport

Walking

The site is surrounded by prestige walking routes that access public transport, retail and leisure. A recent active travel survey was undertaken on 3rd March 2021. This identifies the good walking connections of the site but also sets out where the gaps are:

- Footways are provided adjacent to all roads in the vicinity of the site, with the exception of short sections on either side of College Road on the approach to the A4176 Clifton Down, on Northcote Road not along the perimeter wall of the BZG site on the western side of the road.
- A Puffin crossing is provided across the A4176 Clifton Down approximately 50m to the north east of the College Road junction. a footpath which continues across Clifton Downs to the north.
- On College Road a Zebra crossing is provided some 70m south of the junction with the A4176 Clifton Down.
- An uncontrolled pedestrian crossing with central island is also provided across College Road at the junction with Clifton Down.
- Tactile paving and dropped kerbs are provided at junctions to the south of the site, including the Guthrie Road junctions with College Road and Northcote Road.
- Three uncontrolled crossing points are provided on Guthrie Road with road narrowings, raised tables and tactile paving provided.

Example of the easy connectivity to retail;

- Alma Vale Road is some 600m to the east of the site with a mix of shops including the Clifton Mini Market convenience store, restaurants and cafes provided.
- The centre of Clifton Village is around 900m to the south of the site with a range of high end retail establishments, restaurants, and cafes. Co-op and Tesco Express convenience stores are also provided, along with a Post Office and pharmacy.
- Whiteladies Road is approximately 1km to the east of the site with a range of retail, restaurants and cafes provided.

Internal Layout

The provision of three vehicle access points and vehicle turning areas around the site aims to distribute vehicles around the site and minimise the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow vehicle speeds through the space and encourage free flow of pedestrian and cycle movement.

Cycling

There are no on-road or off-road cycle routes in the immediate vicinity of the site. However 135m from the western corner of the site a shared footway/cycleway is provided along the A4176 Bridge Valley Road, which in turn connects to the A4 Portway shared footway/cycleway some 1km to the west, providing a traffic free cycle route between Bristol city centre and Avonmouth.

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Comments.docx22/02737.F Bristol Zoo

Cycle Parking

A total of 380 secure resident cycle parking spaces are proposed for the apartments, with each cycle store containing sufficient parking to provide at least one cycle space per bedroom of the associated apartment building. 40 cycle spaces will be provided for visitors. This is an acceptable quantum.

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Weekday BZG &

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Vehicle Traffic

Generation

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BZG Visitors 288 288 576

Clifton Pavilion Visitors 129 129 258

Hide Visitors 94 94 188

Education Centre 33 33 66

Total 625 625 1250

Car Parking

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The results of on-street parking surveys undertaken on:

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Comments.docx22/02737.F Bristol Zoo

Thursday 25th February 2021 at 20.0

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Guthrie Road

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Northcote Road (full length) 17 9

Cecil Road (full length) 12 26

College Fields (full length) 23 28

Clifton Down triangle east (full

length

6 23

Clifton Down triangle south

(full length)

0 30

Canynge Road (full length) 30 36

Total 127 239

Car Club

The application provides 1 car club and the provision of parking for this exact location to be linked

to S278 process with the possibility of it being an electric car club car, subject to being able to achieve a charging point on street.

Internal parking management

The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan will be required to detail how this will be managed.

Travel Planning

Construction Management

Advices

I021A) Alterations to Vehicular Access

I023A) Oversailing

I024A) Works on the Public Highway

I025A) Minor works on the Public Highway

I026A) Traffic Regulation Order (TRO) UPDATE TRO SPREADSHEET

I027A) Highway to be Adopted

I028A) Public Right of Way

I043A) Impact on the highway network during construction

I044A) Restriction of Parking Permits – Existing Controlled Parking Zone/Residents Parking Scheme

I045A) Restriction of Parking Permits – Future Controlled Parking Zone/Residents Parking Scheme

I046A) New driveway in a Residents Parking Scheme or a Proposed Parking Scheme

I052) Highway Condition Survey

File Name: S:\PLAN\Officers\Matthew\ - Applications\Zoo\Full\Comments\TDM

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I053) Excavation Works on the Adopted Highway

I054) Private Road

I055) Street Name and Numbering

I056) Stopping Up/Diversion of Adopted Highway

I057) Stopping or Diverting a Public Right Of Way

I058) Sustainable Drainage System (SUDS)

Transport Development Management 3 of 3

Date: 29th March 2023

TDM Summary

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

TDM support the application because:

- The proposed development is consistent with national and local transport policy.
- The location of the site is accessible to pedestrians, cyclists, and public transport users.
- Site permeability to pedestrians also integrates the site with the surrounding pedestrian routes.
- Access to services, education and employment areas are within walking and cycling distance of the site, which is in line with local and national policies
- Satisfactory vehicular access can be achieved from College Road, Guthrie Road and Northcote Road. The provision of three vehicle access points distributes vehicles both around the site and local road network to minimise traffic impact. The details of which will be subject to S278 agreement.

- The internal site layout is able cater for all road users including service vehicles as shown by swept path analysis.
- The level of car parking proposed is suitable for the location of the site given that local facilities are accessible by foot, cycle, and public transport, and that on-street parking is controlled by a residents parking zone for which new residents would not be able to purchase permits.
- The sustainable travel measures proposed including secure cycle parking in excess of the minimum standards, car club car, and the implementation of a Travel Plan at the site further would encourage the use of alternative modes of transport to the private car, reducing car parking demand.
- Comparing average traffic generation, the proposed traffic generation of the development would be less than the existing BZG traffic generation therefore there is a net traffic benefit of the scheme compared to the existing use of the site. This would also be the case when considering the cumulative impact of both the residential schemes at West Car Park and BZG.
- The proposed scheme would generate substantially lower levels of traffic than from the BZG use on peak BZG visitor days.
- There are no road safety concern on the local road network and there is no reason to suggest that that proposal would affect this situation.

The obligations and conditions

The obligations requested are considered required and meet the CIL Regulations 122 test, in that it would be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development

Obligations

- The extent and scope of the S278/ S38
- Contributions of £220 per residential unit for travel plan delivery and management or £5,693 where applicant will do their own delivery

Pre commencement conditions

B1B Approval of road works necessary

B38 Construction Management Plan – Major Developments

C. Pre occupation conditions

C7A Completion of Vehicular Access – Shown on Approved Plans

C8 Completion of Pedestrians/Cyclists Access – Shown

C35 Car Club

C36 Electric Vehicle Charging Points

TDM Assessment details

The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.

Officers have reviewed this application and identified the following areas for detailed comments:

- Road network - Access and Road Safety – The safe movement of all modes entering and exiting the public highway
- Trip Generation –The existing and proposed trips related to the site
- Active Transport – Walking and cycling and behaviour change
- Public Transport – Current access and future potential

- Servicing and Delivery – How the development will manage the vehicular trips required
- Car Parking - How the development will manage the vehicular trips required

Location

The site is bounded by the BZG North Car Park to the north west (with the A4176 Clifton Down beyond), Northcote Road to the north east, Guthrie Road to the south east, and College Road to the south west.

Constraints

- The BZG North Car Park on land controlled by the Downs Committee to the north west. The Downs Committee made clear that they would not support any motorised vehicle access to the proposed development that would impact on the existing layout.
- Northcote Road is one way northbound

Road Network

Strategic

The strategic route for motorised vehicles access connects:

- A4176 Clifton Down from the A4 Portway around 1km to the south west to the A4018, 1km to the north east. The A4018 continues north to the M5 junction 17 around 7km north of the site. To the south the A4018 continues into Bristol city centre around 2.5km to the south.
- A4176 signal junction with the A4 Portway some 1km to the south west of the site, the A4 continues north for some 8km to Avonmouth and the M5 junction 18A and south east some 3km into Bristol city centre.

Local Roads

- Northcote Road is a one way road northbound along the eastern boundary of BZG. continues north east to meet The Avenue at a priority junction immediately east of the BZG North Car Park. The Avenue meets Clifton Down 20m further north at a priority junction. To the south The Avenue continues approximately 290m to meet Guthrie Road at a priority junction.
- College Road bounds the site from junction with the A4176 Clifton Down to junction with Guthrie Road at a priority junction immediately north west of the site.. College Road also has a junction with Cecil Road junctions some 160m and 250 south east of Clifton Down respectively Raised tables are provided at both junctions. A right turn lane is provided on Clifton Down for around three cars to be able to wait to turn right into College Road
- Guthrie Road forms the southern boundary from junction with College Road, to junction with Northcote Road 180m east of College Road. Guthrie Road continues north east to Pembroke Road a further 170m north east. There are traffic calming measures - road narrowings and raised tables.

Speed Limit

A 30mph speed limit is in place on the A4176 Clifton Down, with 20mph speed limits in place on College Road, Guthrie Road, Northcote Road, and other streets to the south, east, and west of the site.

Road Traffic casualty assessment

The TS showed evidence covering a five year period January 2016 to December 2020 inclusive. Roads included in the review are the A4176 from Ladies Mile/Clifton Down junction to Pembroke Road, College Road from A4176 to Guthrie Road, and the full length of Guthrie Road and Northcote Road.

- One slight accident occurred at the College Road junction with the A4176 Clifton Down to the north of the site with a car on College Road overshooting the junction and into the path of a vehicle travelling south west bound on the A4176.
- One slight accident occurred on the A4174 at the BZG car park exit where a vehicle leaving the car park hit a pedestrian walking along the footway on the A4174.
- Two slight accidents occurred at the A4176 junction with Ladies Mile and Clifton Down triangle some 150m to the west of the site,
- One slight accident was recorded on Guthrie Road, between the Northcote Road and The Avenue junctions.
- Three slight accidents, occurred at the A4174 junction with Pembroke Road.

Proposed changes to the public highway

The changes to the public highway will be subject to the S278 works. The S278 extent of works To the rear of opposite footway on Northcote Road, Guthrie Road and College Road. From jct/w A4176 to far side of junctions with Guthrie Road, works covered by agreement could include:

- signalised junctions
- safety related works such as traffic calming,
- street lighting,
- drainage
- Street trees
- improved facilities for pedestrians and cyclist.
- Any changes to the traffic regulations
- Resurfacing, lines and signs

To ensure all road safety matters are addressed the developer will fund independent road safety audits throughout the S278 programme until certification.

Active Transport

Walking

The site is surrounded by prestige walking routes that access public transport, retail and leisure. A recent active travel survey was undertaken on 3rd March 2021. This identifies the good walking connections of the site but also sets out where the gaps are:

- Footways are provided adjacent to all roads in the vicinity of the site, with the exception of short sections on either side of College Road on the approach to the A4176 Clifton Down, on Northcote Road not along the perimeter wall of the BZG site on the western side of the road.
- A Puffin crossing is provided across the A4176 Clifton Down approximately 50m to the north east of the College Road junction. a footpath which continues across Clifton Downs to the north.
- On College Road a Zebra crossing is provided some 70m south of the junction with the A4176 Clifton Down.
- An uncontrolled pedestrian crossing with central island is also provided across College Road at the junction with Clifton Down.
- Tactile paving and dropped kerbs are provided at junctions to the south of the site, including the Guthrie Road junctions with College Road and Northcote Road.
- Three uncontrolled crossing points are provided on Guthrie Road with road narrowings, raised tables and tactile paving provided.

Example of the easy connectivity to retail;

- Alma Vale Road is some 600m to the east of the site with a mix of shops including the Clifton Mini Market convenience store, restaurants and cafes provided.
- The centre of Clifton Village is around 900m to the south of the site with a range of high end retail establishments, restaurants, and cafes. Co-op and Tesco Express convenience stores

are also provided, along with a Post Office and pharmacy.

- Whiteladies Road is approximately 1km to the east of the site with a range of retail, restaurants and cafes provided.

Internal Layout

The provision of three vehicle access points and vehicle turning areas around the site aims to distribute vehicles around the site and minimise the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow vehicle speeds through the space and encourage free flow of pedestrian and cycle movement.

Cycling

There are no on-road or off-road cycle routes in the immediate vicinity of the site. However 135m from the western corner of the site a shared footway/cycleway is provided along the A4176 Bridge Valley Road, which in turn connects to the A4 Portway shared footway/cycleway some 1km to the west, providing a traffic free cycle route between Bristol city centre and Avonmouth.

Cycle Parking

A total of 380 secure resident cycle parking spaces are proposed for the apartments, with each cycle store containing sufficient parking to provide at least one cycle space per bedroom of the associated apartment building. 40 cycle spaces will be provided for visitors. This is an acceptable quantum.

Public Transport

Bus

Bus stops are located on the A4176 Clifton Down immediately north of BZG, with the southbound stop just north of the junction with College Road, and the northbound stop a further 40m to the north east. The bus stops are equipped with real time information, shelters and timetables. The southbound stop is served by bus services 8 and 505 and the northbound stop by bus service 505. There are 7 further

Train

Clifton Down train station is around 1km to the east of the site. Destinations served from this railway station include Bristol Temple Meads, Weston-Super-Mare and local stations of Redland, Montpellier, Lawrence Hill, Avonmouth and Severn Beach. Connecting services to destinations across the country are also provided from Bristol Temple Meads including London, Birmingham, Cardiff and Exeter and beyond. During the day Monday to Saturday services operate around every 30 minutes in both directions between Avonmouth and Bristol Temple Meads, continuing to/from Severn Beach and Weston-Super-Mare every hour. In the evening services operate every 30- 60 minutes from Temple Meads to Severn Beach. On Sunday an hourly service is provided between Bristol Temple Meads and Severn Beach.

Trip Generation

The Zoo generally attracted more Weekend vehicle than the weekday. Events are also more frequent on weekends.

The analysis looked a differentiating between staff and visitor trips the average week

Daily 24 Hour -

Weekday BZG &

Associated Uses

Vehicle Traffic

Arrivals Departures Two-way

Generation

BZG Staff 81 81 162

BZG Visitors 288 288 576

Clifton Pavilion Visitors 129 129 258

Hide Visitors 94 94 188

Education Centre 33 33 66

Total 625 625 1250

Car Parking

The area around the site forms part of the Bristol Residents' Parking Scheme (RPS). On a number of the roads within the vicinity of BZG including College Road, Cecil Road, and Guthrie Road many of the bays are shared permit holder and pay and display use bays. Vehicles can park either with a permit or for a maximum of five hours using the pay and display bays Monday to Friday 09.00-17.00. Immediately adjacent to the site on Cecil Road permit holder only bays are provided also operating Monday to Friday 09.00-17.00. No restrictions are in place in the evening and during weekends.

The results of on-street parking surveys undertaken on:

Thursday 25th February 2021 at 20.0

Road No. of Cars Parked No. of Spaces Not Occupied

College Road (Clifton Down to

Guthrie Road

18 17

Guthrie Road (full length) 30 23

Northcote Road (full length) 17 44

Total 65 84

Wednesday 1st December 2021 at 20.00.

Road No. of Cars Parked No. of Spaces Not Occupied

College Road (Clifton Down to

Guthrie Road

32 52

Guthrie Road (full length) 7 35

Northcote Road (full length) 17 9

Cecil Road (full length) 12 26

College Fields (full length) 23 28

Clifton Down triangle east (full length

6 23

Clifton Down triangle south (full length)

0 30

Canynge Road (full length) 30 36

Total 127 239

Car Club

The application provides 1 car club and the provision of parking for this exact location to be linked to S278 process with the possibility of it being an electric car club car, subject to being able to achieve a charging point on street.

Internal parking management

The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan will be required to detail how this will be managed.

Travel Planning

The obligation contribution will be prioritised for reducing car dependency and the road safety of

new residents and the relationship with Clifton College.

Construction Management

The construction management plan will be expected to demonstrate consideration of Clifton College when managing the construction trips related to the site.

C. Pre occupation conditions

C7A Completion of Vehicular Access – Shown on Approved Plans

C8 Completion of Pedestrians/Cyclists Access – Shown

C35 Car Club

C36 Electric Vehicle Charging Points

Advices

I021A) Alterations to Vehicular Access

I023A) Oversailing

I024A) Works on the Public Highway

I025A) Minor works on the Public Highway

I026A) Traffic Regulation Order (TRO)

I027A) Highway to be Adopted

I028A) Public Right of Way

I043A) Impact on the highway network during construction

I044A) Restriction of Parking Permits – Existing Controlled Parking Zone/Residents Parking Scheme

I045A) Restriction of Parking Permits – Future Controlled Parking Zone/Residents Parking Scheme

I046A) New driveway in a Residents Parking Scheme or a Proposed Parking Scheme

I052) Highway Condition Survey

I053) Excavation Works on the Adopted Highway

I054) Private Road

I055) Street Name and Numbering

I056) Stopping Up/Diversion of Adopted Highway

I057) Stopping or Diverting a Public Right Of Way

I058) Sustainable Drainage System (SUDS)

TDM Response to transport related objections from consultees of the most recent consultation.

Re: Historic England

The evidence provided by the applicant shows the trips to the site will be significantly lower than when it was as a zoo. (this is in comparison between servicing and delivery trips related to the Zoo site in operation against the proposed residential site not including the offsite visitor carparking).

They are also contributing S106 for travel planning will be used to promote safer and sustainable travel by the future residents to discourage private car ownership.

All of the changes impacting the highway will be subject to safety audits and adjustments will be able to be made within the S278 works.

Officers therefore are satisfied any concerns can be satisfactorily mitigated for.

Clifton College

TDM officers have reviewed the concerns of Clifton College using the information provided by the objector and are of an opinion that it is not sufficient to be deemed severe and therefore unlikely to sustain an objection.

The internal streets have been designed to provide a liveable neighbourhood taking into account the needs of pedestrians and disabled users moving around the site.

The provision of three vehicle access points and vehicle turning areas around the site minimises the vehicular impact on pedestrians making use of the main retained gardens area and Grand Terrace. The design of the streets and surface materials proposed also aims to encourage slow vehicle speeds through the space and encourage free flow of pedestrian and cycle movement. The internal streets around the site would be managed by a management company to make sure that no parking takes place outside of the marked parking bays. A condition for a parking management plan will be required to detail how this will be managed.

To mitigate for the any road safety concerns for the new site the applicant will be contributing All of the changes impacting the highway will be subject to safety audits and adjustments will be able to be made within the S278 works.

TDM officers have worked through a series of options for mitigating any road safety implications with the developer and the proposal thqat they can be reasonably addressed within the Section S278 process because the extent of S278 boundary works plan includes an area that would be deemed appropriate. The developer will enter into a Section 278 agreement prior to commencement which will include the formalisation of the extent of S278 works development on the existing road network identified in plan ref X

(A redline plan S278 extent of works To the rear of opposite footway on Northcote Road, Guthrie Road and

College Road. From jct/w A4176 to far side of junctions with Guthrie Road.)

works covered by agreement could include:

- signalised junctions
- safety related works such as traffic calming,
- street lighting,
- drainage
- Street trees
- improved facilities for pedestrians and cyclist.
- Any changes to the traffic regulations
- Resurfacing, lines and signs

To ensure all road safety matters are addressed the developer will fund independent road safety audits throughout the S278 programme until certification.

Officers therefore are satisfied any concerns can be satisfactorily mitigated

Twentieth Century Society

Date: 5th August 2022

05 August 2022

Dear Case Officer

Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA

The Twentieth Century Society has been notified of the above application for 'Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure.' There are a number of designated and non-designated heritage assets on the site and it is located within the Clifton and Hotwells Conservation Area.

Site

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Bristol Zoological Gardens was founded by The Bristol, Clifton, and West of England Zoological Society and opened in 1836. Much of the heritage, built and landscaped, on the site dates from the 19th century and we defer to the Victorian Society for comment on the impact the proposed scheme would have on this work.

Of interest to the Society is the work carried out from the early 20th century, particularly the Monkey Temple (1928), the Clifton Pavilion (1930), the Clock Tower Building (Hide Restaurant/Bug World) (1938-), the Birds of Prey Aviary (1962), and the Terrace Theatre (2003).

Policy

The Monkey Temple and Birds of Prey Aviary were designated Grade II in 2022. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority [...] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.” The zoo is also located within the Clifton and Hotwells Conservation Area. Section 72 requests that local authorities pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework (NPPF, 2021) includes paragraph 199 which states that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation [...] This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” Paragraph 200 states that any harm to, or loss of, significance should require clear and convincing justification. –

The Clifton Pavilion is locally listed and the Clock Tower Building and Terrace Theatre are unlisted but should be treated as non-designated heritage assets on account of their architectural and historic interest. The NPPF states that local authorities should take into account desirability of conserving heritage assets and putting them to viable uses consistent with their conservation for the benefit of communities (paragraphs 189 and 197). Paragraph 203 asks local authorities to consider the effect of an application on the significance of NDHAs.

Proposals

The Bristol, Clifton & West of England Zoological Society has announced that the zoo will close from September 2022 and the site adapted and developed for residential use with a ‘Clifton Conservation Hub’ for educational use. We understand that the zoo intends to sell the site with consent in place for the scheme. Our assessment responds to the proposals in their current form, as presented in the submitted documents.

Our Assessment

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

We hope that these comments are of use to you. We would be grateful if you could please notify us of your decision on this application.

Yours sincerely,

Coco Whittaker
Caseworker
The Twentieth Century Society

Urban Design Team

Date: 2nd March 2023

Application: 22/02737/F & 22/02889/LA Bristol Zoological Gardens

Summary:

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

Heritage assessment:

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

- Local Historic Park and Garden – the site
- Clifton and Hotwells Conservation Area (within)
- The Downs Conservation Area (immediately to the north)
- Listed buildings:
 - Bristol Zoological Gardens entrance (Grade II), north west corner of site
 - Giraffe House (Grade II), south eastern side
 - South entrance gates and flanking walls, Gurthrie Road
 - Clifton College, various Grade II and Grade II* listed buildings (to the south)
 - Bear Pit (Grade II), within the site
 - Monkey Temple (Grade II), within the site
 - Eagle Aviary (Grade II), within the site
- Locally listed building:
 - The Clifton Pavilion (west side of site, facing College Road)

- Clifton Music School (southern tip at junction of College Road and Guthrie Road)
- Clifton College Preparatory School (north east)
- Houses on Clifton Down (to the west)

Significance (NPPF, paragraph 194/5)

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

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

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

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

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

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

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

The retention and reuse of numerous assets within the site; entrance lodges, bearpit, monkey temple, eagle aviary, giraffe house, Clifton Pavilion and the approach to the listed Guthrie Road entrance are welcomed as heritage gains. Similarly, the free public access proposed to the gardens between the hours of 8am and 5pm represents a heritage benefit, given it will increase public interaction with a number of heritage assets within the site.

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

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

This part of the Clifton and Hotwells Conservation Area is predominantly characterised by large Victorian residential villas that front Clifton and Durdham Downs and surrounding streets as recognised by Panoramic View 21 in the Character Appraisal. The type of large residential apartment blocks proposed

for the zoo (as demonstrated in view 1 of the appendices) will consequently differ from this character and not preserve or enhance the character and appearance of the conservation area as required by the Act (Town and Country Planning (Listed Buildings and Conservation Areas) Act, 1990).

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

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

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

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

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

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

Urban Design:

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

Conclusion:

Clear and convincing justification for any harm to the significance of heritage assets is required in accordance with **paragraph 200 of the NPPF**. The applicant has stated that the level of harm caused by the scale, massing and general quantum of the proposed development is required to ensure the delivery

of the heritage gains and public benefits of the scheme. These heritage gains include the retention and reuse of the various heritage assets (designated and non-designated) and enhancement to aspects of the conservation area as detailed above.

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

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

View 1



Camera Location [356845, 81, 174184] Bearing 166° Pitch 0° Focal Length 50mm 21/03/2022 16:00

© VU.CITY 2022

View 2



Camera Location [356691, 72, 174005] Bearing 68° Pitch 0° Focal Length 60mm 21/03/2022 16:00

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View 3



View 4



Camera Location [357087, 67, 173686] Bearing 339° Pitch 0° Focal Length 50mm 21/03/2022 16:00

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View 5



Wessex Water

Date: 8th November 2022

I refer to your consultation in respect of the above and apologise for the delay in response. Please find attached an extract from our records showing the approximate location of our apparatus in the vicinity of the site. The following comments are made on behalf of Wessex Water:

New proposed foul water connections are shown on the below ground drainage layout plans. The majority of the flows are shown to connect to an existing foul water manhole on site connecting to the public foul water sewer at MH ST56739901 (Guthrie Road). This is assumed to be the previous main sewer connection from the operational site and is acceptable in principle (subject to application).

Other connections are proposed for Residential Block E1 within drawing 29730/6002 to sewer manhole ST56749001 in Northcote Road and Residential Block north of the Giraffe House to manhole ST56749012. This is acceptable in principle although further investigations will be required for the latter connection. According to our records manhole ST56749012 is on a recently discovered sewer with unknown downstream connectivity. Wessex Water will investigate downstream connectivity.

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

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

The applicant may contact the undersigned to discuss further.

Kind Regards

Gillian Sanders

Planning Liaison Manager

Wessex Water