

Bristol Zoo Application Comments Summary

22/02889/LA

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 neighbour associations. For comments from neighbours and other members of the public, please see the document titled 'Neighbour Comments'.
- It has not been possible to include all figures, tables, or pictures included within the original comments within this document.

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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
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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.

BCC Conservation Advisory Panel

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

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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 two-storey 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

The Twentieth Century Society 1 of 2

Date: 8th August 2022

Dear Matthew Blunt

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

The Twentieth Century Society has been notified of the above application for 'Works to listed buildings to facilitate the redevelopment of the site to include 201 residential units (Class C3), community floorspace (Class E, F1 and F2), and open space with associated landscaping, play space, parking, accesses (pedestrian, cycle and vehicular), and infrastructure.' There are a number of designated and non-designated heritage assets on the site and it is located within the Clifton and Hotwells Conservation Area.

Site

Bristol Zoological Gardens was founded by The Bristol, Clifton, and West of England Zoological Society and opened in 1836. Much of the heritage, built and landscaped, on the site dates from the 19th century and we defer to the Victorian Society for comment on the impact the proposed scheme would have on this work.

Of interest to the Society is the work carried out from the early 20th century, particularly the Monkey Temple (1928), the Clifton Pavilion (1930), the Clock Tower Building (Hide Restaurant/Bug World) (1938-), the Birds of Prey Aviary (1962), and the Terrace Theatre (2003).

Policy

The Monkey Temple and Birds of Prey Aviary were designated Grade II in 2022.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority [...] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses." The zoo is also located within the Clifton and Hotwells Conservation Area. Section 72 requests that local authorities pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework (NPPF, 2021) includes paragraph 199 which states that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation [...] This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Paragraph 200 states that any harm to, or loss of, significance should require clear and convincing justification. –

The Clifton Pavilion is locally listed and the Clock Tower Building and Terrace Theatre are unlisted but should be treated as non-designated heritage assets on account of their architectural and historic interest. The NPPF states that local authorities should take into account desirability of conserving heritage assets and putting them to viable uses consistent with their conservation for the benefit of communities (paragraphs 189 and 197). Paragraph 203 asks local authorities to consider the effect of an application on the significance of NDHAs.

Proposals

The Bristol, Clifton & West of England Zoological Society has announced that the zoo will close from September 2022 and the site adapted and developed for residential use with a 'Clifton Conservation Hub' for educational use. We understand that the zoo intends to sell the site with consent in place for the scheme. Our assessment responds to the proposals in their current form, as presented in the submitted documents.

Our Assessment

The Society has no objections to the majority of the work proposed to the 20th-century buildings and enclosures on the site. We do not take issue with the proposed reuse of

the Grade II Birds of Prey Aviary as a seating area, and we support plans to restore the Grade II Monkey Temple as a garden folly. We are pleased that the Terrace Theatre (2003) will be retained as a community facility. When we first reviewed the application, we were concerned about the proposed two-storey zinc tile-clad rooftop extension to the 1930s Clock Tower Building which we felt would have a detrimental impact on the building. The architects have now revised and improved the design and, as such, we do not wish to comment on this aspect of the scheme.

We hope that these comments are of use to you. We would be grateful if you could please notify us of your decision on this application.

Yours sincerely,

Coco Whittaker

Caseworker

The Twentieth Century Society

Twentieth Century Society 2 of 2

Date: 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

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 and Conservation

Date: 02/03/2023

Application: 22/02737/F & 22/02889/LA Bristol Zoological Gardens

Summary:

Bristol Zoo is one of the earliest provincial zoos in the world and is consequently a highly significant heritage site.

The relocation of the zoo to enable greater focus on its valuable conservation work is recognised.

The proposals include heritage gains including improvements to the site boundaries and adaptive reuse of designated and non-designated heritage assets.

However, the proposed new residential units within the site and the scale and massing of apartment blocks around the perimeter of the site lead to less than substantial harm (NPPF, paragraph 202) to the significance of the Clifton and Hotwells Conservation Area and setting of listed buildings within and around the site.

Clear and convincing justification for any harm to the significance of heritage assets is required in accordance with paragraph 200 of the NPPF. The applicant has stated that the level of harm caused by the scale, massing and general quantum of the proposed development is required to ensure the delivery of the heritage gains and public benefits of the scheme.

Revised plans and documents were submitted in late October/early November 2022, the Planning Statement and Design and Access Statement explains the key changes made. These comments respond to those submissions. A Vu.City model has also been provided, any views that have been relied upon when making these comments are included within the document.

Heritage assessment:

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

Local Historic Park and Garden – the site

Clifton and Hotwells Conservation Area (within)

The Downs Conservation Area (immediately to the north)

Listed buildings:

Bristol Zoological Gardens entrance (Grade II), north west corner of site

Giraffe House (Grade II), south eastern side

South entrance gates and flanking walls, Gurthrie Road

Clifton College, various Grade II and Grade II* listed buildings (to the south)

Bear Pit (Grade II), within the site

Monkey Temple (Grade II), within the site

Eagle Aviary (Grade II), within the site

Locally listed building:

The Clifton Pavilion (west side of site, facing College Road)

Clifton Music School (southern tip at junction of College Road and Guthrie Road)

Clifton College Preparatory School (north east)

Houses on Clifton Down (to the west)

Significance (NPPF, paragraph 194/5)

Bristol Zoological Gardens opened in 1836 and is predated only by Paris, London and Dublin zoos.

Features from the original design of the zoo survive including the entrance lodges (listed grade II), the former bear pit (listed grade II) and terrace promenade.

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

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

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

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

The relocation of the zoo poses many challenges particularly where there are so many important aspects to the site as summarised above. The proposal offers opportunities particularly where the practical necessities of running a zoological garden in a residential neighbourhood have led to parts of the site making a neutral or negative contribution to the character and appearance of the conservation area. The boundaries to the site, particular along Northcote Road on the east side of the site and in the middle section of the College Road boundary are proposed to be improved through this development offering an enhancement to these aspects of the conservation area.

The retention and reuse of numerous assets within the site; entrance lodges, bearpit, monkey temple, eagle aviary, giraffe house, Clifton Pavilion and the approach to the listed Guthrie Road entrance are welcomed as heritage gains. Similarly, the free public access proposed to the gardens between the hours of 8am and 5pm represents a heritage benefit, given it will increase public interaction with a number of heritage assets within the site.

Despite these gains the proposals will cause a degree of less than substantial harm to the character and appearance of the conservation area and setting of heritage assets within and around the site. This harm will be caused by the scale and massing of the perimeter residential blocks and the introduction of residential dwellings within the historic landscape.

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

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

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

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

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

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

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

Urban Design:

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

Conclusion:

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

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

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

View 1



View 2



View 3



View 4



Camera Location [357087, 67, 173686] Bearing 339° Pitch 0° Focal Length 50mm 21/03/2022 16:00

© VU.CITY 2022

View 5



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

END OF DOCUMENT