

# **Zoo Application Comments Summary**

**22/02889/LA**

## **Appendix 2 - Neighbour Comments**

**DC Committee date 26<sup>th</sup> April 2023**

### **Notes:**

- This document includes comments from neighbours and other members of the public. For comments from stakeholders such as statutory consultees, internal contributors, interest groups, and neighbour associations, please see Appendix 1 'Contributor Comments'.
- Some comments included within this document are duplicates, meaning this document exaggerates the number of comments received in response to this application. As explained within the Committee Report, in total, 24 objections and 1 support comment have been received (as of 17.04.23).
- It has not been possible to include all figures, tables, or pictures included within the original comments within this document.

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## First consultation phase

15<sup>th</sup> June 2022 – 6<sup>th</sup> November 2022

STANCE	COMMENTS	DATE RECEIVED
1. O	I'm a parent at Clifton College and I'm very concerned about parking and the use of the zoo carpark which is currently available to the school community. Another 200 new build homes is not what this densely built up area of Clifton needs! Let the site become something of value to the community, for education about the natural world and environmental education. surely affordable housing can go elsewhere not in this historical site.	15-Jun-22
2. O	As a local resident I am concerned about the effect of the residential development of the Zoo Site. Clifton as a whole is already running low on space for existing households. In particular the issue of parking for cars. 201 extra household will invariably mean a significant increase in the number of cars. Either 201 parking spaces (an undesirable idea) will need to be provided or residents will end up parking their cars in surrounding streets which are already very full. The aesthetic of the area also must be considered. There are several examples of unsympathetic development throughout the Conservation Area already. It is of course impractical to demolish them. The Zoo site should not become another of these unsympathetic developments. The aesthetic of the area is integral to what makes Clifton a unique part of Bristol. The style of many of the proposed buildings do not fit the style of other residential properties in the area. I am also concerned that some of the buildings are too tall. Many of the buildings in the surrounding area are harmonious in height. The number of stories ought to be reconsidered to fit in better with the surrounding buildings. In summary I feel that the redevelopment of the Zoo site ought to be a purely community focused project. The residential plans ought to be scaled back significantly, if not entirely removed. The redevelopment of such a historically important site should not be seen as a financial opportunity but a preservation project. Preserve the integrity of the local area and the history of the site.	15-Jun-22

3. O	<p>I would like to make it clear that the majority of the opposition to the current development plans have nothing to do with neighbours being 'entitled'. The Zoo site is in a Conservation area, that does not mean new housing cannot be built, it means that developers need to have sensitivity when designing the housing. Building styles that are incongruous with the surrounding historic building are damaging to the character of the area. Key reasons for the Clifton area being a desirable part of the city to live are its proximity to green space and characteristic architecture. The proposed height of some of the planned buildings detract from the view of the Downs from some aspects whilst also not blending in with existing architecture. These are genuine concerns that are being hand waved as entitlement. For Clifton to remain a unique part of the city effort needs to be made to retain what makes it unique. Everyone is aware of the need for more housing Bristol. Clifton has already had many of its properties converted to multiple occupancy dwellings. Again, the reluctance to add additional housing is not coming from a place of selfishness. Clifton is already quite densely populated for an area of its size. It also has high numbers of visitors. Parking is already an issue with current residents and visitors. Adding housing inevitably means more cars, exacerbating the issue. Bristol public transport is not affordable or reliable enough for these new residents to rely as their primary mode of transport so building new housing is essentially baking in the need for parking for these new residents. That is potentially 60+ more cars in an area that struggles with parking and traffic. It is easy to claim that residents are being entitled but only residents have a true appreciation for how the plans might impact their local area.</p>	15-Jun-22
4. O	<p>'Other plans include the creation of approximately 200 high-quality, much-needed new homes, located mainly in areas where there are already built structures. Homes will range in size to encourage different generations to live there, and 20 percent will be affordable.' The zoo are hiding behind the need for homes as an excuse for gaining planning permission. 80% of the homes will be highly priced because this is Clifton. It is increasingly likely that these will be second homes for those working in Bristol and living in surrounding beauty spots at weekends. What does 'Affordable' mean?. All of the properties should be for families who will make use of the gardens and play park. Families who cant afford any car let alone 2 cars to make use of cycle facilities etc.</p>	15-Jun-22

5. O	Object. You are not helping people from lower income families. The zoo was central. Every one could get there. It was always full!!! Not all people have cars! Also it's environment in making people travel further by car. Some families were able to walk to the zoo. For people who have live in flats or small houses with very little garden or no gardens would use the zoo as a safe okay plus educational space!! For elderly people it was a safe space to walk and even if alone you could be busy seeing the wonderful conservation with the animals and beautiful gardens. We have enough property for wealthy people. Sadly our own children who are Bristolian can not afford to buy or rent properties. !!!! If all the properties were done on a lottery for all young people and families who need property that may feel more ecological and society fairness. But it's as usual greedy property developers who will pay back hands in our corrupt society and not care about the society or it's long term needs ... Just there own selfishness for money	17-Jun-22
6. O	Having such tall buildings in that beautiful area would be an eye sore. It's not in keeping with the surrounding buildings. It would not blend in.	29-Jun-22
7. O	The development height is out of proportion to the surrounding buildings. The public access gardens are not visible from the public domain. Because of the height and almost full circumference around the garden of the proposed blocks of flats, I am concerned about the amount of sunlight that will reach the public space will be limited. The style of proposed building is out of character for the area. Square blocks of 6-floor flats do not fit within a Victorian and Georgian area. Of course I realise Bristol needs houses - could they perhaps be less ugly?	29-Jun-22
8. O	Whilst i appreciate that the site needs to be developed, i am extremely concerned over the proposed height of the development running alongside Northcote Road. It will mean that my flat will loo directly at a newly developed dwelling and this will not only impede on my privacy, it will also impact on the overall value of the property. The proposal for over 200 dwellings is likely to cause an increase in traffic to the area and, this is already quite saturated. I have concerns that the small, local road infrastructure will not be able to cope with such an increase. I would like the Council to consider reducing the height of the proposed dwellings that overlook Northcote road and also moving them further away from the edge of the proposed development. This will enable a greater level of privacy for all concerned and also a better proliferation of natural light for the residents of Northcote Road, some who live in basement dwellings and where natural light is scarce. Thank you	04-Jul-22
9. O	Any comments on this application are tied to the position regarding the full planning application. However, the substantial harm to the setting of the listed buildings would not be outweighed by substantial public benefit. The context of the listed buildings would be completely eroded and their original purpose would no longer make sense within the proposed development. The proposal does not accord with relevant Local Plan heritage policies nor the requirements of the NPPF and cannot be supported.	05-Jul-22

10. O	<p>I object to the proposed scheme as it does not respect Clifton, its architecture, Bristol Zoo or its heritage in any way. Nor does it respect the scale of the surrounding buildings or the fact the site is situated in a conservation area. The proposed building designs could have been selected from a house builders' catalogue and built anywhere in the UK. The monolithic brick facades that run along the lengths of Clifton Down and Northcote Road stand out like a sore thumb, to put it mildly. The tallest buildings currently on Northcote Road are approximately 8 meters high which occupies approximately 40% of the road. All remaining buildings are one storey. It is unacceptable to propose buildings at least 14 meters high (4 and 5 storeys high) along the entire length of the road. It's clear there has been little to no consideration for the residents who live on or overlook Northcote Road in terms of loss of light and privacy. The proposed buildings should not exceed the height of the existing tallest building - as is the case for proposed dwellings along College Road. I appreciate the aims of the redevelopment with regards to preserving the gardens along with public access, but this reduces the space available for smaller dwellings to be constructed. The compromise at present is to build tall structures around the perimeter. However, the compromise should be that lower structures are proposed or the balance of dwellings available within the site is reconsidered. I cannot support this scheme.</p>	05-Jul-22
11. O	<p>The proposed development looks like an extreme modern urban overdevelopment and not at all in keeping with its historical Victorian setting. I object on the following grounds: 1. The proposed homes are too high. The new build should no greater in height than the immediate surrounding buildings on neighbouring roads. 2.The proposed design of the buildings are not sympathetic to the area. 3. If this development is really to be sustainable then there should be no allowance for car parking and there should be a covenant on the buildings that residents/occupiers/renters (short and long term) cannot be car owners as well. The future of cities has to be carless and electric cars are not a solution to their petrol or diesel counterparts/forebears. It would be possible to have cars for co-ownership in the surrounding streets which existing residents of these streets could also use and this would help to reduce rates of car ownership generally. There is of course good public transport in Bristol.</p>	11-Jul-22

12. O	<p>I wish to object to the proposal as it stands to build around 200 dwellings on the current Bristol zoo site. I am doing so for the following reasons: My wife and I are former teachers at Clifton College Preparatory School and looking at the plans, I think they will have a considerable impact on the school itself, and we have particular concerns re the impact on the privacy of the students. I feel too the bulidings as currently shown will have a negative impact on the appearance and character of what is an outstanding conservation area. I have a number of former colleagues who live in Northcote Road. The tall structures shown on the plans will have a huge and detrimental impact on the adjoining buildings on Northcote Road. The increase of traffic and the need for parking space as a result of 200 dwellings will be difficult to accommodate and will make life much more difficult for existing residents.</p>	18-Jul-22
13. R	<p>Thank you for consulting HB&amp;P on this application. I apologise for the delay in responding. While the departure of the Zoo from this site will harm the overall historic and communal value of the Gardens, HB&amp;P acknowledges that an element of residential development is acceptable to secure the future of the site. However, we do have concerns with some aspects of the application. We welcome the proposals to retain the 'parkland' setting around the central lake as well as the removal of later unsympathetic accretions to the designated and local heritage assets, and their refurbishment as parkland follies and dwellings. We agree that the location of the new apartment buildings is best located to the perimeter of the site, as proposed, however, their height and scale is excessive and harmful to the setting of the listed Zoo buildings and to the character of the conservation area. The existing buildings to be demolished are small scale and of different heights with spaces between each building, whereas the proposed buildings present a solid built form extending along each frontage, with little permeability beyond the formal entrances. The design and massing of these new buildings, particularly those on Guthrie Street opposite the listed Clifton College buildings, don't appear to fit well within the streetscapes of the conservation area, and at up to 6 stories, are too tall for the area. While not a listed building, the Art Deco clock building contributes to the story and development of the zoo over time. The roof extension is clumsy and doesn't respect the elongated proportions of the building, harming its appearance. Retaining it in its existing form would be preferable, and would provide a needed gap between the taller new buildings to either side. While we don't oppose a modern architectural design, the design of the perimeter buildings should be reconsidered to better reflect the modulation, scale and rhythm of the neighbouring development to ensure the new development will contribute to and enhance the historic interest and significance of the conservation area. Relevant NPPF (2021) policy considerations are: o Paragraph 195: "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal". o Paragraph 199: "When considering the impact of a proposed development on the significance of</p>	27-Jul-22

	<p>a designated heritage asset, great weight should be given to the asset's conservation". o Paragraph 200: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification." Chapter 16 of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990 establish the requirements to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. I would be grateful if we could be informed of the outcome when this becomes available. Regards Ross Anthony</p>	
14. O	<p>The blocks proposed are overmassed and overscaled. They are incongruous in the setting of surrounding listed buildings, buildings of historic significance and the Downs. The infrastructure required to serve the new buildings is likely to cause serious damage to the roots of rare trees, shrubs and other plants. The applicants appear to have failed to give serious consideration to this problem. As there are insufficient parking spaces for the number of cars owned by site residents, it is likely that the roads within the development will be littered with parked cars. It seems unlikely that future residents of these dwellings will be prepared to fund the substantial cost of properly maintaining the Gardens. Rare species often need specialised care. This aspect of the proposals needs to be given careful consideration. How much does the Zoo spend on garden maintenance at present? This development will not enhance or improve the Conservation Area. The founding fathers would certainly not approve of the site being turned into a housing estate.</p>	09-Aug-22

15. O	I write to object to the revised plans, in particular to the plans for North block (N1, 2 & 3) of boundary buildings. Despite the tinkering of P& P's reply to previous criticism, the height of the block of 6 storey housing is still both domineering and inappropriate. 6 storeys is much too tall, dwarfing the charming and iconic Main Entrance building and creating a barrier with The Downs. Moreover, the design of the these buildings, and other boundary blocks, is not site specific. The designs are NOT a 'sensitive response to historic context', as P&P claim. These are generic buildings which could drop into any urban area anywhere. Decorating ends of the North buildings with zoo animals is merely window dressing, not addressing this issue. The present design is so mediocre that it risks, in 30 years time, looking like the buildings round Bristol's Bear Pit. As the Victorian Society has explained so carefully, this zoo site is very rare. It is much loved and, if it must be developed, deserves the highest quality treatment, not shown in this present planning application.	14-Aug-22
16. O	I write to object to the perimeter buildings on this site proposal. I support the criticisms of both the Victorian Society and Historic Buildings and Places with reference to the density and height of the perimeter housing. These proposals do not take account either of the effect of the housing on the internal space of this rare early 19th century zoological gardens, nor of the effect on the external, Conservation Area, neighbouring houses. Their charitable purposes clearly state that their responsibility is to achieve best value, not best price. Neither density, nor height of the housing is necessary. This is a unacceptable legacy from this much-loved institution to leave to the Clifton area and wider Bristol.	14-Aug-22
17. S	I would like to record my support for the zoo's development plans to counter the negativity of entitled neighbours, horrified at the idea of much-needed housing being built in this part of Clifton. The designs are sensitive, with buildings only proposed where buildings already exist; traffic will be far less than current zoo visitors - and the public will be given free access into the beautiful gardens. While it is incredibly sad that the zoo has to close, this application needs to be approved so that the people of Bristol can benefit from the additional housing - and the zoo can realise the sale and obtain funding to continue its valuable work.	23-Aug-22

18. O	<p>As a local resident I am concerned about the effect of the residential development of the Zoo Site. Clifton as a whole is already running low on space for existing households. In particular the issue of parking for cars. 201 extra household will invariably mean a significant increase in the number of cars. Either 201 parking spaces (an undesirable idea) will need to be provided or residents will end up parking their cars in surrounding streets which are already very full. The aesthetic of the area also must be considered. There are several examples of unsympathetic development throughout the Conservation Area already. It is of course impractical to demolish them. The Zoo site should not become another of these unsympathetic developments. The aesthetic of the area is integral to what makes Clifton a unique part of Bristol. The style of many of the proposed buildings do not fit the style of other residential properties in the area. I am also concerned that some of the buildings are too tall. Many of the buildings in the surrounding area are harmonious in height. The number of stories ought to be reconsidered to fit in better with the surrounding buildings. In summary I feel that the redevelopment of the Zoo site ought to be a purely community focused project. The residential plans ought to be scaled back significantly, if not entirely removed. The redevelopment of such a historically important site should not be seen as a financial opportunity but a preservation project. Preserve the integrity of the local area and the history of the site.</p>	03-Sep-22
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19. O	<p>I would like to make it clear that the majority of the opposition to the current development plans have nothing to do with neighbours being 'entitled'. The Zoo site is in a Conservation area, that does not mean new housing cannot be built, it means that developers need to have sensitivity when designing the housing. Building styles that are incongruous with the surrounding historic building are damaging to the character of the area. Key reasons for the Clifton area being a desirable part of the city to live are its proximity to green space and characteristic architecture. The proposed height of some of the planned buildings detract from the view of the Downs from some aspects whilst also not blending in with existing architecture. These are genuine concerns that are being hand waved as entitlement. For Clifton to remain a unique part of the city effort needs to be made to retain what makes it unique. Everyone is aware of the need for more housing Bristol. Clifton has already had many of its properties converted to multiple occupancy dwellings. Again, the reluctance to add additional housing is not coming from a place of selfishness. Clifton is already quite densely populated for an area of its size. It also has high numbers of visitors. Parking is already an issue with current residents and visitors. Adding housing inevitably means more cars, exacerbating the issue. Bristol public transport is not affordable or reliable enough for these new residents to rely as their primary mode of transport so building new housing is essentially baking in the need for parking for these new residents. That is potentially 60+ more cars in an area that struggles with parking and traffic. It is easy to claim that residents are being entitled but only residents have a true appreciation for how the plans might impact their local area.</p>	03-Sep-22
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## Second consultation phase

7<sup>th</sup> November 2022 – 15<sup>th</sup> January 2023

STANCE	COMMENTS	DATE RECEIVED
20. O	I have re-read the revised documentation that has been submitted, but have been unable to identify any changes that in any way address the points that I raised in our initial objection. It would appear that the concerns over the style and density of the development and the severe overbearing nature of the proposed construction in a low rise neighbourhood have not been in any way listened to. I would like the committee to consider our previous concerns to be very much still current, and request that they reject this development for something in keeping with the character, heritage and style of the surrounding streets.	13-Nov-22
21. O	After reading through the planning permissions I am shocked at how we have been misled. I was under the impression that the focus was going to be placed on creating a local garden that would represent the zoo's history. Instead there is going to be a large housing development that destroys so much of the incredible wildlife that the zoo has. I think another tourist attraction would be a much better use of space and would drive the tourism industry in Bristol. We could have a Bristol kew gardens. I have many memories as a child playing in the zoo gardens and now as a young adult was looking forward to doing the same with my children. Please stop this housing development, it's going to do a large amount of damage for many many years, when there is an easier much more pleasant solution.	29-Nov-22

22. O	<p>Summary of Objection The role of zoos within the UK and throughout the world has obviously changed over time from what could be considered as traditional visitor attractions, to one where zoos are now centres of learning and excellence whose function is to ensure the survival of critically endangered species. From reviewing the latest available published figures, around 500,000 people visited Bristol Zoo in 2019. Since it opened in 1836, over 90million people have passed through its gates. Families have been entertained and interacted with the animals at close quarters. They have learned about the vital conservation work that is integral to saving endangered species across the planet. However, we are of the firm belief that the closure of this much loved and respected Zoo is premature and ill judged. We believe that the proposals to convert the site into a housing scheme has been poorly conceived and designed and fails to recognise the architectural importance of the wider area.</p> <p>Planning Policy The site of Bristol Zoo sits within the Conservation Area of Clifton &amp; Hotwells. Clifton &amp; Hotwells was designated as a conservation area on 26 September 1972 and extended on 16 February 1977 and 18 February 1981. The Clifton &amp; Hotwells Conservation Area Character Appraisal was adopted on 14 July 2010. In exercising its planning functions in a conservation area, the local planning authority is under a duty to pay "special attention to the desirability of preserving or enhancing the character or appearance" of the area (s.72 Planning (Listed Buildings and Conservation Areas) Act 1990). Bristol's conservation areas are the subject of policies in the Bristol Local Plan as described below. The Local Plan now consists of the Core Strategy which was adopted in June 2011 and the Local Development Policies plan, which was adopted in 2014. These documents alongside the Conservation Character Appraisal form the Development Plan and all planning decisions put before the Authority should be based around these local plan policies and National Planning policy and guidance. National Planning Policy is in the form of the NPPF 2021 which provides strategic and high level guidance to Developers and Local Authorities in relation to development proposals. Specific guidance in relation to housing development and the potential impact on heritage assets is detailed within Chapter 16 Conserving and Preserving the Historic Environment. This chapter goes into more detail as to what is expected of an Applicant when submitting developments proposals and how Local Planning Authorities should measure and assess such proposal in the context of the importance of such heritage assets, eg Listed Buildings and Conservation Areas.</p> <p>Local Context The conservation area of Clifton &amp; Hotwells focuses upon the development of terraces, crescents and streets that rise from Hotwells in the south before meeting the open landscape provided by Avon Gorge and Clifton Down to the west and north. The area is characterised by its dramatic climb from 10m above sea level at the lowest point alongside the Floating Harbour, reaching up to 90m at the highest towards Clifton Park where Bristol Zoo is located. Bristol Zoo is surrounded by buildings that are owned and operated by Clifton College (Guthrie Road and Northcote Road) and early, mid and late Victorian, 3 storey villas that are situated along College Road and the wider urban environment beyond. The predominant built form of the immediate area surrounding Bristol Zoo area large Victorian 3 storey (plus basement) villas which are either</p>	04-Jan-23
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	<p>detached or semi-detached being either two or three bays wide. These properties are set back from the pavement edge with front mature front gardens and low boundary walls. There is a very strong and prominent building line that is consistent across the area. The dominant building materials used within these building is rubble limestone, pennant sandstone and Bathstone quoins and detailing. Windows are traditional timber sash with panelled front doors. The overall architectural style provides a strong sense of place that manages to combine residential elements along College Road with a strong and robust architectural style of Clifton College seen along Guthrie Road and Northcote Road. Figure 1 below provides an overview of the building type, context and character of the wider Bristol Zoo area. Of note and of relevance to this application is;</p> <ul style="list-style-type: none"> <li>- Blue highlighted buildings to the south of Guthrie Road - Listed Grade II</li> <li>- Brown highlighted buildings located along College Road and Northcote Road. These are buildings which add value to the townscape character and make a positive contribution to the conservation area.</li> <li>- Mauve highlighted buildings. Key unlisted buildings such as Clifton Pavilion and buildings belonging to the Clifton College along Guthrie Road and the wider educational establishment that contribute to the character of the area.</li> </ul> <p>Figure 1 Extract of Buildings Types surrounding Bristol Zoo. Taken from Clifton &amp; Hotwells Conservation Character Area Appraisal 2010. Of greater importance is the wider views (medium and long distance) that are found within this part of the Conservation Area. Clifton Downs is located directly to the north of the Bristol Zoo site. It rises up steeply to provide panoramic views over the Zoo, Clifton and beyond. The significance of these views cannot be overstated and Bristol Zoo as well as Clifton College adjacent are identified as a 'Landmark of City wide importance' within the Character Appraisal. Figure 3 below, provides an extract of the important views that have been considered prominent within and adjacent to the Bristol Zoo site. As can be seen many of these views look north towards Clifton Downs (L23 - L27) but equally views are equally possible looking south from Clifton Downs across Bristol Zoo, Clifton and the wider urban environment (See green crescent shape in extract below). The applicant proposes to construct a six storey high apartment block (spanning the entire width of the site), along the northern elevation, that will rise above the existing ground level by some 19.35m. By doing so it will completely obliterate existing views looking south from the Downs across Clifton and the wider environs of Bristol. See photo image (figure 2) below. Figure 2 View looking south from Clifton Down onto northern boundary of Bristol Zoo. Red Line approximately defines height of proposed apartment block</p> <p>The overall setting and character of Bristol Zoo is one that has evolved and developed over nearly 180 years. There are buildings within the Zoo site and along the periphery of the site that do not compliment the historic character of the area but they in most instances do not impose or detract historic integrity of overall historic importance of this area. Figure 3. Extract of Important views as described in the Clifton &amp; Hotwells. Conservation Character Appraisal. 2010. As can be seen from Figure 4 below, a clear sense of place and architectural style has been created over the development of this part of the Conservation area. This has allowed the Bristol Zoo site and the Clifton College site to form a 'hub' of</p>	
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	<p>larger institutional buildings that is surrounding by smaller scale but none the less, important Victorian residential buildings. These Victorian villas broadly define the east and western boundaries of the Bristol Zoo (and Clifton College) site along College Road and Pembroke Road. The open space of Clifton Downs then provides a natural 'full stop' to any development directly to the north which is bordered by Clifton Down Road. The Conservation Character appraisal states at para 6.1.4 that; The street pattern to the north of the conservation area is more regular, and sits more comfortably on a grid pattern of cross cutting streets, with the Zoo and Clifton College at their heart. The Applicant is attempting to redefine the very character of the conservation area by introducing inappropriate and poorly designed residential apartment blocks that will be entirely alien to the setting of the conservation area and its setting. Such buildings will be at odds with the overall architectural layout and theme of this area that has taken almost 180 years to evolve. These monolithic apartment blocks will impose an architectural style on this area that will be completely alien to this character and setting of this area and will fail to preserve or enhance the conservation area. Figure 4 Extract of Land use within the Clifton &amp; Hotwells Conservation Area. 2010. Appraisal and review of the proposed design i). Comparative heights of buildings. There has been no critical analysis and discussion of the different roof heights of the proposed apartment block compared to the buildings immediately adjacent to the site along College Road, Guthrie Road and Northcote Road. There are no cross-sectional drawings to show how the proposed apartment buildings will relate to the existing buildings in height, scale and mass. If such drawings did exist, it would clearly show the disparity between the height of the proposed apartment blocks compared to the educational buildings of Clifton College and the Victorian residential villas along College Road. The apartment blocks (known as E1, E2 E3 and S1) will completely dominate the educational buildings of Clifton College, located along Northcote Road and Guthrie Road. From reviewing the proposed elevational drawings provided by the applicant, the buildings will rise up on average between 14,0m to 17,0m above ground level. It is accepted that there are ground level differences running north to south, but the overall impact of such inappropriately designed buildings being located directly opposite these handsome educational buildings will lead to a downgrading of the architectural value of these buildings and will have a detrimental impact within the conservation area. Equally and potentially of more importance is the impact on the northern block (N1 2 &amp; 3) on the listed building in the North West corner of the site. (detailed as the Clifton Conservation Hub). This unique building which is listed Grade II will be completely dominated by the construction of this new apartment block. No attempt has been made by the Applicant to review or explain this impact or show the inter-relationship between the existing heritage asset and the proposed apartment block. ii) Loss of open green space within the site Whilst it is fully acknowledged that access into Bristol Zoo is via an entry fee, the Zoo has been designated as a Local Historic Park &amp; Garden and an Important Open Space. The area provides a traffic free space that allows visitors to interact with the animals at very close quarters. The proposals would completely and totally alter the character</p>	
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	<p>of this area by introducing tarmaced roads, parking spaces (for 121No vehicles) and garage parking throughout the site. The sense of place would be altered from a traffic environment to a fairly standard suburban housing estate. It will resemble a gated community that will restrict access to the general public and will eventually provide communal garden areas for the sole use and enjoyment of the residents. Inevitably the lack of parking spaces provided within the scheme, will mean that increasingly cars will be parked inappropriately along the internal access roads further detracting from what is currently a pleasant green open space. There is increasing concern that despite the assertion from the Applicant that the internal green areas will be open to the public, the layout and form of the proposed scheme will completely alienate the general public from visiting this site. The newly formed entrances into the site will provide direct road access into the site from College Road, Clifton Down and Guthrie Road. The invitation for the general public to explore the internal green space will not be clear and it will be increasingly seen as the preserve of the use of the residents only. This is very much at odds with the zoo's historic role as a key part of the city's green / open space fabric, reflected by its planning designation as a Local Historic Park &amp; Garden and an Important Open Space. iii). Loss of historic boundary features The proposals for the development of the various apartment blocks along Guthrie Road and Northcote Road means that entire lengths of existing rubble and pennant sandstone boundary wall features will need to demolished. These stone walls range between approximately 2.5m high to about 5,0m - 6,0m high at the junction of Guthrie Road and Northcote Road. The loss of such historic features to accommodate these apartment blocks will further degrade the historic fabric of the Zoo site and will have a detrimental impact on the conservation area in this locality. Equally the construction of the apartment block running parallel to Clifton Down (northern boundary) will also mean the entire loss of this boundary wall that currently exists. The drawings do not make it clear at all whether this boundary wall feature is being retained or not. It is assumed currently that the boundary wall will be demolished. There is an equally strong boundary wall feature that exists along College Road. It is not at all clear from the proposals as to whether this 2.5m high wall will remain intact or whether this will be demolished also. Further clarification should be sought from the Applicant as to his intentions. iv) Enabling Development It is accepted that in some instances in order to make a development commercially viable, some alterations need to occur to listed buildings and heritage assets. This is the case for the Giraffe House and other listed buildings within the site such as the Bear Pit, the Monkey Temple and the Aviary building. The Applicant is proposing to convert the Giraffe house into residential accommodation and the remaining heritage assets will be integrated into the wider landscaping scheme for the site. However, what has not be made clear by the Applicant is the justification for such a radical change from one use to another. Paragraphs 199 - 208 of the NPPF (2021) goes into greater detail as to how harm should be assessed and whether the significance of that harm is acceptable or not. The concluding paragraph (208) is of particular significance for this application. It states that; Local planning authorities should assess</p>	
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	<p>whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. It is vital that the LPA carefully reviews the justification of harm to these important heritage assets and whether the principal of development here has been fully explained and justified. We are of the firm belief that the significance of harm that the proposals will have on the Conservation area as well as the listed heritage assets do not outweigh the benefits of the proposed scheme.</p> <p>v). Tenure &amp; Ownership The affordable housing statement (Savills, October 2022) seems to suggest that the spread of first homes and affordable rented accommodation (40No units in total) will be evenly spread out across the site and that as a result the scheme will be 'tenure blind'. However, if one analyses the accommodation schedule that has been prepared by the applicant, it is evident that Block S1, all 30No units within this block will be rented and managed by a social housing provider. The 10no first homes will be spread out between Blocks E2 &amp; E3. We don't see how such a proposal will successfully integrate the different types of tenure into the scheme. It will only serve to potentially stigmatise the occupants of this apartment block (S1) and the overall housing scheme will be poorly integrated as a result.</p> <p>vi) Loss of a Community Facility There is a clear and direct link back to the Bristol Core Strategy (2011) and the Development Plan Policies (2014) that seeks to prevent the loss of Community Facilities. The Local Plan does not precisely define what a community facility is, but at para 2.5.2 it states that community facilities can be; community centres and childcare facilities, cultural centres and venues, places of worship, education establishments and training centres, health and social care facilities, sport and recreation facilities and civic and administrative facilities. It may also include other uses whose primary function is commercial but perform a social or community role i.e. sport, recreational and leisure facilities including local pubs. Both Local Plan policy DM5 and Core Strategy Policy BCS12 make direct reference to the fact that the loss of Community Facilities will not be permitted unless it can be clearly demonstrated that there is no longer a demand for the facility or that the building/s are no longer suitable to accommodate the use and the building cannot be retained or adapted to another community use. Furthermore Policy DM5 goes onto state that the loss of a community facility will only be acceptable if a replacement facility can be provided in 'a suitable alternative location'. The location of the Wildplace Project is in a location (off Junction 17, M5) that will require visitors to arrive via car or other motorised transport. The site is totally inaccessible to people without the means of a car. The appeal of the Bristol Zoo site is that it is centrally located and it is accessible via bus or by foot or by bicycle. We would strongly argue that the Applicant has not fully and sufficiently demonstrated that the alternative uses of the Zoo as a community facility has been fully and carefully explored. There has been no critical analysis and explanation as to whether the buildings and the site as a whole can be enhanced, adapted or whether a mixed use scheme could be introduced in order to keep the Zoo site operating as a commercial concern in its current location. The Zoo has played a crucial and integral role in the local community for the past 180 years.</p>	
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	<p>The Applicant appears to be ignoring the very strong relationships that have developed over this period between the local community and the zoo and is basing decisions about the future of this facility purely of commercial and financial objectives. Scant regard has been paid as to the potential impact that the closure of this facility will have on the local community and its potential replacement in a total unsustainable location that can only be accessed if families or individuals have a car.</p> <p>Conclusions The City of Bristol Local Planning Authority have a legal duty which is clearly set out in the Listed Buildings &amp; Conservation Act. The LPA must have special regard to protecting listed buildings and the character and appearance of conservation areas. They must ensure that the setting and context of these important heritage assets are duly protected, preserved and enhanced. The NPPF (2021) places considerable weight on ensuring that these importance heritage assets are duly protected and requires Decision Makers to pay due regard to ensuring that such assets are not negatively impacted by development proposals. LPAs are clearly advised that they should refuse planning permission if the impacts of a development outweighs the benefits of such a proposal. (ie the delivery of housing units). Overall the proposal that has been submitted by the Applicant for consideration does not preserve or enhance either the character or appearance of Clifton &amp; Hotwells conservation area. The impacts on the various listed heritage assets (within and adjacent to the site) have not been fully justified and explained. The benefits of the proposal do not outweigh the impacts on these important buildings as defined above. The loss of green open space within the site is of great concern and the proposals put forward provide no evidence that this space would be guaranteed for public use in perpetuity. We would recommend that your officers recommend refusal of this application and urge you to support our objection of this application. Both Local plan and National planning policy provide a clear route to substantiating a refusal of planning permission. Notwithstanding the above we have outlined below a number of reasons for refusal which we believe are relevant and pertinent to this application. Reasons for Refusal The proposed development due to its insensitive design, form, scale, positioning and due to the loss of original fabric, would fail to respect the existing special character and historic significance of the listed building. It would also harm the character and appearance of Clifton &amp; Hotwells conservation area. The harm is not outweighed by adequate public benefit and therefore the proposal is contrary to the NPPF, adopted Policies BCS21, BCS22, DM26, DM30 and DM31, Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant guidance from SPD2 - A guide for designing house extensions and alterations. The proposed development at roof level would impose visual disharmony and the impact on the adjacent educational and residential buildings. The change in building height would be particularly noticeable when viewed from Clifton Downs and would undermine the appearance of the Conservation Area thus failing to accord with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposed works would amount to substantial harm, it is considered that there are insufficient public benefits associated with the development and would therefore fail to</p>	
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	<p>accord with the requirements of Paragraph 202 of the NPPF and Policies BCS22 - Conservation and the Historic Environment of the Bristol City Council Core Strategy (adopted June 2011) and DM31 - Heritage Assets of the Bristol City Council Site Allocations and Development Management Policies Document (Adopted July 2014) and is therefore unacceptable. By virtue of its siting, scale, form, mass and overall design the proposed development as currently designed would therefore appear as an unsympathetic and overly prominent addition in this setting, failing to preserve the character of the established street scene; this part of the Clifton &amp; Hotwells Conservation Area or the setting of surrounding Listed Buildings. Accordingly, the proposal conflicts with Section 16 of the National Planning Policy Framework (2018); Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990; Core Strategy (2011) Policies BCS21 and BCS22 and Site Allocations and Development Management Policies (2014) DM26, DM29 and DM31. The Applicant has failed to suitably demonstrate that the loss of this important community facility is justified. The evidence put forward does not provide sufficient justification as to why this community facility has to close and why an alternative or more suitable appropriate use cannot be found in this location that would allow the site to be utilised and be maintained as a community facility for the longer term. Core Strategy (adopted June 2011) Policy BCS12 and Site Allocations Development Management Policies DM5. (Adopted July 2014) and is therefore unacceptable.</p>	
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## Third consultation phase

16<sup>th</sup> January 2023 – 17<sup>th</sup> April 2023

STANCE	COMMENTS	DATE RECEIVED
23. O	I write to object to the revised plans, in particular to the plans for North block (N1, 2 & 3) of boundary buildings. Despite the tinkering of P& P's reply to previous criticism, the height of the block of 6 storey housing is still both domineering and inappropriate. 6 storeys is much too tall, dwarfing the charming and iconic Main Entrance building and creating a barrier with The Downs. Moreover, the design of these buildings, and other boundary blocks, is not site specific. The designs are NOT a 'sensitive response to historic context', as P&P claim. These are generic buildings which could drop into any urban area anywhere. Decorating ends of the North buildings with zoo animals is merely window dressing, not addressing this issue. The present design is so mediocre that it risks, in 30 years time, looking like the buildings round Bristol's Bear Pit. As the Victorian Society has explained so carefully, this zoo site is very rare. It is much loved and, if it must be developed, deserves the highest quality treatment, not shown in this present planning application.	24-Jan-23
24. O	I write to object to the perimeter buildings on this site proposal. I support the criticisms of both the Victorian Society and Historic Buildings and Places with reference to the density and height of the perimeter housing. These proposals do not take account either of the effect of the housing on the internal space of this rare early 19th century zoological gardens, nor of the effect on the external, Conservation Area, neighbouring houses. Their charitable purposes clearly state that their responsibility is to achieve best value, not best price. Neither density, nor height of the housing is necessary. This is an unacceptable legacy from this much-loved institution to leave to the Clifton area and wider Bristol.	24-Jan-23
25. O	Object because it's the loss of a public amenity and loss of green space and loss of a beautiful historic garden with many irreplaceable trees.	03-Feb-23
26. O	We object to this redevelopment on the grounds that this redevelopment will not preserve or enhance the character of the area especially in a conservation area. The Zoo's legacy should be sympathetic to this and therefore, special attention should be made to this objection by the council. Many thanks.	08-Feb-23

27. O	<p>I object to this application 22/02889/LA and the associated application 22/02737/F. These two applications are a scheme for redevelopment of Bristol Zoo Gardens from a site of public, natural and cultural heritage to private, residential housing and they should be considered together. I have read the report provided by Save Bristol Zoo Gardens (Report) as well as applicant's main planning documents. This is not a comprehensive list of reasons but several which are important to me. 1. The Zoo provided misleading reasons for its closure. According to the planning statement, the Zoo suffered a decline in visitor numbers from 1m to about 500,000 a year which caused the Zoo to make a loss. The reason for this loss is blamed on the small site, inability to meet the animals' needs, and inadequate parking. The Report shows that the Zoo's attendance numbers are better than comparable zoos, not that far off London Zoo, and that the Zoo has made profits in recent years including with Government support during Covid. The Report states that the majority of the Zoo's animals will be sold or given away. The public is being led to think that the majority of the animals will be kept and given larger enclosures at the new site, when this is not the case. It may be a better match for the Zoo's conservation aims but ultimately feels like they are deliberately fudging things. Like many friends and family, who have grown up with the Zoo, we were initially behind the Zoo's closure as we believed the reasons given. But it looks like we were not properly informed. 2. The Zoo is a very special site for Bristol. Housebuilding should not be something to be pursued at the expense of destroying the special character of our City. Decent housing should be a right for all. Many Bristolians are unhoused, or live in housing which makes them cold and sick. Yet Bristol Post reported in 2021 that there are over 1,000 empty homes in the city. Why should the Zoo be developed into houses? The site has been a well-loved public place for 180 years. The fact that it charges an entry fee is not relevant. Anyone who has ever been there will remember visitors of all description: class, race, gender, age, locals using the playground, tourists gawping, a couple on a date, a family's special day out, schoolchildren, even visiting scientists. If housing trumps everything (which is what the current Mayor has said), then we should be building on the Downs, or tearing down the Suspension Bridge in favour of a newer, wider bridge. We don't do that because these places are special and part of the character of our City. The Zoo is part of Bristol's cultural heritage. Developing the Zoo into housing is no way "respecting the character and heritage of the site". It will mean Bristol and its citizens lose one of the defining features of our City. The Zoo and 196 households will be richer, but the rest of us will be poorer for it. 3. The Zoo shouldn't be allowed to act like a private developer in relation to what has become over 186 years, a public asset. Query whether the Zoo, as a charity, has powers to make this application if it is against the broader public interest. Bristol Zoological Society is a charity dedicated to conservation and education. It runs Bristol Zoo as well as the Wild Place Zoo in South Gloucestershire. As a charity it has tax exemptions because of the public benefits of its objectives. But what if this application can be seen as a conflict between the objectives of conservation and public benefit? This means while it may be lawful under its constitution to take the best action for conservation and education, this comes at the expense of the value and importance of the Zoo site to the City and its people. Does the Zoo not have a duty of care to the public? In "A Pattern Language" (1977) by Christopher</p>	18-Feb-23
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	<p>Alexander and others, it states "When you build a thing you cannot merely build that thing in isolation, but must repair the world around it, and within it, so that the larger world at that one place becomes more coherent, and more whole." In 2023, more and more people accept that keeping wild animals captive makes them suffer. What if a zoo for the future doesn't do that anymore, while maintaining the public interest for some kind of zoo at this site. Could development at this site be used to repair the damage caused by zoos of the past and create a positive way forward, encouraging greater empathy with animals and natural habitats both familiar and alien to us, to benefit the Zoo's animals and the wider public of Bristol? If the Zoo doesn't want to pursue this, could they be encouraged to sell to a publicly minded entity that will? In summary, this site has special significance to Bristol and its people and it should not be turned into housing of any kind.</p>	
28. O	<p>As a member of Bristol Zoo and BOTANICAL GARDENS, I was not informed of imminent closure. Bristol residents given no opportunity to fund raise There is no reason (other than financial), to destroy 12 acres of World Famous Botanical Gardens ancient trees, for high end housing in an environmental crisis. Ancient trees, plants gone for ever. The site has to be preserved for future generations.</p>	23-Feb-23

29. O	<p>The application proposals breach the Planning (Listed Buildings and Conservation Areas) Act 1990 (the "LB and Conservation Areas Act") in failing to preserve or enhance the character or appearance of the area (Article 72(1)). Clifton Conservation Area was designated in 1970 and the Conservation Area Appraisal was updated in 2010. The Clifton Conservation Area Appraisal lists Bristol Zoo among six "crucial landmarks nationally and on Bristol's landscape" (para 6.3.2). "The variety and quality of views in Clifton are a critical component of the area's special interest," (para 6.2.3) The proposals conflict with Long View L25, Local View LC21 and a Landmark of City Wide Importance (see Map 4). The cumulative effect of high density housing development on West Car Park and Bristol Zoo will result in a canyon effect. This will result in substantial harm to neighbouring listed buildings, heritage and the Clifton Conservation Area, in conflict with the Appraisal and the LB and Conservations Area Act. Core Strategy Policy BCS22 requires that "Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including ... Conservation Area." The proposals conflict with Policy BCS22 with regard to scale, design and massing. I do not accept the position of Historic England. These proposals will result in substantial harm to the Conservation Area and the important listed buildings on Guthrie Road at Clifton College. This application for Listed Buildings Consent should be refused.</p>	24-Feb-23
30. O	<p>This space, without animals, should be for all the people of Bristol to enjoy. The proposed plans do not reflect this ethos. Luxury housing is not an appropriate plan for this space. Moreover, the cutting down of so so many trees would be so damaging. Support heritage and history for all of Bristol to enjoy. Rather than financial wealth for a few. There are so few chances to save local hertigate sites, save this space for the future generations.</p>	02-Mar-23

31. O	<p>It is well known, but little regarded, that there are many disadvantages in preparing design proposals from the metropolis for the genius loci of an historic city in the provinces and this scheme illustrates it very well. . But there is one potential advantage for a metropolitan elite, concerning the provision of private outdoor space, and an exploration of that feature alone will serve to demonstrate how ill-fitting are the proposals for the Bristol Zoo site. London has demonstrated time and again the inability of their architects to design effective, private outdoor spaces for flats, since the first C20 mansion blocks grew balconies. Reduced of late to becoming transparent, wind and rain stricken and offensive of townscape with residents' clutter, such balconies are mostly entirely unsuited to the British climate. Flat-owners have been progressively failed by architects, in even medium-rise blocks. Unfortunately the London architects for the zoo site still fail to grasp these issues. When the designs are coupled with flat roofs and hideously level parapets, one has to start asking questions such as why are the ground- and first-floor flats not given open space on ground level with private stair access, and roof pavilions as climate havens on flat roofs given to second- and third-floor flats, served by private stairs and dumb-waiters? . Such solutions provide ready opportunities to create modelled roof scapes that would respond to listed buildings and the historic streets of Clifton, and the need for a green architecture. Where were such assessments by the client body at concept and by the planners at pre-application stages? . This retired conservation architect accordingly supports the analysis of the project by Downs for People, the objections of the Victorian Society, Bristol CAP, and Avon Gardens Trust. Equally the idea of a virtual zoo is unhelpful.</p>	07-Mar-23
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32. O	<p>The current proposals mean irrevocable damage to the historic design, layout and use of the Botanical and Zoological Gardens. Since their design by the local architect Richard Forest in 1836, the gardens were intended for the recreation and education of the citizens of Bristol and beyond for succeeding generations. Although overlaid by subsequent buildings for housing more animals from the 1930s onwards, the original design, including the long walk and borders, lake and pavilions are still evident. The layout of the historic gardens should continue to be used for the purposes for which it was designed. For generations, the people of Bristol, of all ages and backgrounds, have enjoyed the communal value of the gardens, the green space, the opportunities afforded to spend time with families, friends, to celebrate milestones of family history such as weddings and funeral wakes. In particular, the level paths and beauty of the gardens, with or without animals, have provided an intensely valuable resource for children and adults with multiple physical and learning difficulties. The closure of the gardens to some of the most vulnerable people in our society is an unjustifiable loss. The current proposals for development of substantial housing within the site destroys the historic character and use of the site, and will undoubtedly become little more than a gated site for wealthy owners, with very limited or indeed no public access in any meaningful manner. The introduction of garages, parking spaces and roads for cars on the site is unacceptable given the increasing desire of Bristolians to limit car use and would be an unwelcome, unjustifiable intrusion into the site. The design and layout of the proposed dwellings are oversized, too high and do not complement the existing buildings nearby, especially the architecturally significant elements of Clifton College.</p>	07-Apr-23
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