

# Public Forum

## D C Committee A

2pm 26 April 2023



**1. Members of the Development Control Committee A**

Councillors: Richard Eddy (Chair), Paul Goggin (Vice-Chair), Fi Hance, Farah Hussain, Andrew Varney, John Geater, Tom Hathway, Phillipa Hulme and Ed Plowden



Question/Statement Number	Attending to speak	Name
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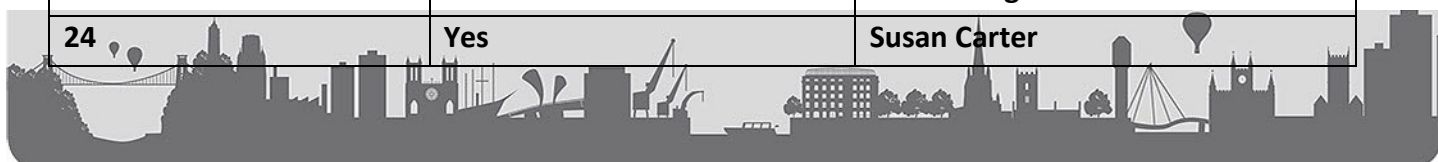
22/02737/F

&amp;

22/02889/LA

Bristol Zoo Gardens, Guthrie Road Bristol

Question 1	Yes	David Redgewell
Question 2	Yes	Andrew Paten
Question 3	Yes	Iain Boyd
Statements 1	Yes	Ian Ray
2	Yes	Justin Morris
3	Yes	Bob Durie
4	Yes	Kathryn Davis
5	Yes	Anna Stevens
6	Yes	George Cuevas
7	No	Sunand Prasad
8	Yes	Chris Jefferies - CHIS
9	Yes	Mark Ashdown – Bristol Tree Forum
10		Dave Wood – Avon Needs Trees
11	Yes	Richard Pedler
12	No	Robert Lee
13	Yes	Geoff Collard
14	Yes	Chris Booy
15	Yes	Francesca Fryer
16	No	Simon Birch – Bristol Civic Society
17	Yes	Gerry Swarbrick – Clifton Neighbourhood Forum
18	Yes	Jerome Thomas
19	Yes – Cllr Grant to speak on Cllr O'Rourke's behalf	Councillor Paula O'Rourke
20	Yes	George Ferguson
21	Yes	Iain Boyd
22	Yes	Georgina Harford
23	Yes	David Redgewell
24	Yes	Susan Carter



25	Yes	Councillor Katy Grant
26		Dr Andy Flack
27	Yes	Adam Chivers
28	Yes	John Hatton
29	Yes	Dominic Hogg
30	Yes	Alastair Sawday
31	Yes	Clifton College
32	Yes	Carrie Sage
33		Tom Jones
34	Yes	Andrew Paten - Chair Northcote Road Residents' Association
35		Lyndsay Davis
36		Douglas Allan
37	Yes	IAN BECKEY Living Easton Heritage and Environmental Group
38		Julie Liponoga
39	Yes	NP
40		Emma Dowds
41		Dr Cameron Kennedy
42	Yes	Dr Nicholas Watts
43		Merita Lawrence
44	Yes	Professor John Tarlton (Bristol Tree Forum)
45		Stephen Layland

### The Vassall Centre, Gill Avenue

**22/03476/F**

Question	Yes	David Redgewell
Statements	No	G Stone
1		
2	No	Martin O'Leary
	Yes	Julian Milne – CEO Bristol Charities
3		
4		Nigel & Lise Bishop



5	No	Henry McCook
6	No	C Hansrod
7	Yes	Mark Blackhall - Driving and Mobility Centre
8		Chris Jury
9		Yiu Choi Ha
10	No	Richard Hutton
11	No	Diana Patrick
12	No	M Hussain
13	Yes – wife Siman Cheok to speak	Chilock Chin
14	No	Yvonne Swinney
15	No	Lori Streich
16		Steve Cottrell
17	No	Kelly Weaver
18	No	Bernadeta Starzak
19		Nadine Amos
20	No	Craig Amos
21	Yes	Elena Cross
22	Yes	Nina Gerrard – Photos to circulate
23	Yes	Lois Dyer
24	Yes	Karen Francis
25	Yes	Murray Cross
26	Yes	Mike Curtis
27	No	Martin Phillips and Diana Wright
28		Katie Wiltshier
29		Simon Dunk
30		S Frith
31		Tanya Thomas
32		Edwin Cross
33		Stephen Thomas
34	Yes	David Redgewell
35		Nancy Carlton
36		Saira Bi



<b>37</b>		<b>Councillor Lesley Alexander</b>
<b>38</b>		<b>Alexandra Heelis</b>
<b>39</b>		<b>Nils Lindahl Elliot</b>
<b>40</b>		<b>IAN BECKEY (Living Easton Heritage and Environmental Group)</b>
<b>41</b>		<b>Linda Williams</b>



## Q1

**Former Bristol zoo site .  
Proposed housing and Gardens Development.**

**Submitted by David Redgewell - South west transport Network and Bristol disability equities forum trustee. Gordon Richardson Bristol disability equities forum.**

### Question 1

in view of the need for more Housing and Homes in Clifton and Bristol.  
Of the 196 homes why are more houses not going to be affordable with a housing association is the site reaching 30 %  
This a large number of people on the council waiting list but the need is for affordable housing and not Executive homes .  
What level of housing is going to accessible and to m standards.  
For disabled people.

### Officer Response.

The proposal's offers an acceptable quantity (20%) of affordable housing, which whilst does not comply with the 40% expectation included within policy BCS17, does comply with expectations of the Affordable Housing Practice Note (AHPN), where the benefit of achieving early delivery of the development and its affordable housing is treated as a material consideration which outweighs the need for compliance with the full requirements of the policy BCS17. See Key Issue F of the Committee Report for further details.

The development includes four wheelchair accessible units (M4(3) wheelchair accessible), meaning the development complies with policy DM4, which sets the principle development plan requirements for accessibility. Three of the units are proposed within the S1 Block, with the remaining wheelchair accessible unit in the Northern Block. 2% of the homes will be M4(3) compliant, albeit the applicant has confirmed that all remaining homes has been designed to be in accordance with the principles of M4(2) 'accessible and adaptable dwellings'. The new builds have been designed to accommodate M4(2) requirements, apart from the need for canopies over doors, and whilst there are limitations when converting historic buildings, the converted dwellings can still achieve compliance with M4(2), apart from level access requirements. See Key Issue D of the Committee Report for further details.

### Question 2 .

With regards to the zoo gardens with the Downs across the road with the garden be open to all residents and tourists.

Be fully accessible to all especially to people with reduced mobility and wheelchair users. With the zoo moved to North Bristol in South Gloucestershire county council area what provision is being made by the zoological society to put on Public transport from the Downs Bristol city centre Clifton Down station to zoo Gardens to Blaise castle estate new Henbury metro west station ,cribbbs causeway bus station and wild place . What discussion and conditions are in place for improvement to public transport to and from the former zoo site and a Green travel plan and not just cycle parking with first group plc west of England buses stagecoach west and the mayor Dan Norris of west of England mayoral combined transport Authority. The zoo must develop a green travel plan.

### **Officer Response.**

The Committee Report includes a full Equality Assessment (page 81 onwards). In conjunction with the Landscape Design Statement, the Design and Access Statement confirms that level access is proposed throughout the gardens. The Hard Landscape Plan also demonstrates that accessibility has been considered, with appropriate hard surfaces being proposed to allow access throughout the site. Further, the Management Plan indicates that all points of access will provide safe and equal access, with sufficient widths to allow access, to for example wheelchair users. The development incorporates appropriate parking for disabled residents and visitors. Specifically, the proposal includes three parking spaces available for disabled residents adjacent to Block S1, one within the undercroft parking area for Block N, and two near the Clifton Conservation Hub available for visitors.

The provision of public transport to the Wild Place Project is outside of the scope of this application, and it would not be reasonable to secure as part of planning permission any financial contribution to the provision of public transport to the Wild Place Project. As explained within Key Issue A.ii of the Committee Report, the Wild Place's website indicates that it is possible to travel by bus from Bristol to stops only a short walk to the Wild Place.

Key Issue G of the Committee Report outlines the sustainable transport measures included within the development and that can be secured as part of planning permission. A residential travel plan has been submitted, and suitable design measures have been incorporated to encourage sustainable transport, including limiting the car parking spaces proposed. The site also has access to public transport.

**Submitted by: Andrew Paten – Chair Northcote Road Residents' Association**

### **Question**

I would find it helpful to have answers to these questions please:

1. What publicity was given to inform people that
  - a) That the zoo had been listed as a community asset
  - b) That alternative uses were welcomed
  - c) That a notice for sale had been issued – which only became clear when put on your portal in January 6months later?
2. Other than the plans and the drawn elevations what other visual images showing the true visual context of the development and its impact on the heritage assets of the buildings, the gardens and the Conservation Area were provided to help better inform people of the impacts of the designs on their surroundings? If there are others than those shown on the portal what were they and when were they shown to Historic England and the Councillors? When were these made available – as the number of images seems very small for such a large and sensitive site? Requests by ourselves and lawyers for this seemed to be mostly ignored. Why was it not felt essential to make these widely available given the sensitivity of the site, the design and its context so that the public, councillors and Historic England could be optimally informed in their decision making and given that this technology is widely available and not expensive in relative terms?

Thank you.

### **Officer Response.**

The plans and documents on the publicly accessible website represents the extent of the information provided, save for a VU.CITY model of the proposal, which is 3D digital planning and design tool that accurately models proposals in context. As VU.CITY is a dynamic and licensed tool, it was not possible to share publicly. As is explained within the Urban Design Team's comments, any views generated within VU.CITY that have been relied upon when assessing the proposal are included within their comments, which aside from being on the publicly accessible website have also been appended to the Committee Report (Appendix 1).

We are confident that what has been published on the publicly accessible website represents the extent of plans and documents shared with Members and Historic England.



**Submitted by: Iain Boyd.**

**Question.**

Committee A members have had the opportunity to be shown the Zoo site and be taken through the BZS proposals. Could you let me know: the dates of such meetings, who attended from the committee, which Council officers, employees or consultants were involved, and who they met and spoke with from the applicant's side?

Many thanks.

**Officer Response.**

Council officers facilitated briefings of Members of both DC Committees by the Zoo on Wednesday 24<sup>th</sup> November 2021, on Wednesday 27<sup>th</sup> April 2022 and a site visit on Monday 12<sup>th</sup> December 2022. Members of both DC Committees were invited to the briefings and members of DC A Committee were invited to the site visit.

All of these events were informal and as such there is not a record of attendance.

Good evening.

This is an application of international importance and it must be refused, or at least delayed, for many reasons.

Others will speak about the historic and international significance of the trees and the fact that the applicants have used the wrong methodology or that despite being a Community Asset the Trustees, whose primary charitable object is the promotion of Conservation, have failed to sufficiently consider alternative uses for the site, but I will focus on the economic and cultural damage to Bristol.

Housing and particularly affordable housing needs to be built in every part of the city, including Clifton. But whether it is Clifton or anywhere else, it should not be built on Heritage sites which can be successfully reimagined for a purpose linked to the original use. The increased costs of doing so mean that housing on these sites would be anything but affordable.

The Everyman Theatre was due for demolition and development. Today, it's a successful cinema, creating jobs and bringing something special to the people of Bristol.

The Bristol Lido, which opened on the 29<sup>th</sup> July 1850, was due for demolition and development into housing.

Today, as a result of the careful re-imagining of a Heritage site and a great deal of hard work, The Lido directly generates millions of pounds annually for the Bristol economy, sustains dozens of local jobs, brings in hundreds of people from outside the city who spend their money here and simply contributes to making Bristol special.

The Bristol Zoo Gardens has everything that The Lido has... times ten:

- Much greater sustained economic value for Bristol
- More local jobs
- Potentially, a national centre for conservation and bio-diversity and
- Something only one other Bristol icon has: an original shareholder named Isambard Kingdom Brunel.

You have everything to gain, and nothing to lose by refusing or at least delaying this application so that an alternative use of lasting cultural and economic value can be developed, with the Trustees, for the city of Bristol.

**Reject this application. Bristol deserves better!!!!**



**STATEMENT IN SUPPORT OF BRISTOL ZOO GARDENS' APPLICATION # 22/02737/F  
DR JUSTIN MORRIS, CEO, BRISTOL ZOOLOGICAL SOCIETY**

Dear Councillors

Firstly, I'd like to thank the Council's officers for their incredible hard work getting to this point. We appreciate the robust and emphatic recommendation to approve.

Closing the Zoo Gardens has provoked strong feelings, which I understand: people love the Zoo, *and* the gardens.

But we have worked carefully, respectfully and with good intention with our community, our staff, officers and statutory bodies to create a development that I think will be held up as an exemplar for others to follow.

And we've done that because the Society is as much a part of this community as anyone else - and the legacy we leave is of huge importance to us.

Rather than apply for outline permission so a developer can then seek to do what it wants, we have gone into great detail so you – and the community – know what we are proposing is exactly what will be permitted.

Nor have we sought to maximise the number of homes over and above all else. The amount of open space accessible to the public will actually increase, compared to what has been available at the Zoo Gardens. We are proposing homes are built mainly around the perimeter and where there are existing building footprints.

We are not washing our hands as we leave the site but will remain a key partner in managing the community facilities we are proposing.

No longer will Bristol residents have to pay to visit the much treasured gardens, but they will be free and funded through the scheme as a public park, now open and accessible to all.

We are proposing to retain and restore the existing listed structures – like the Bear Pit and Monkey Temple – something Historic England welcomed: as it said, the scheme includes 'a number of heritage benefits that...include the retention and restoration of all the listed structures...and the provision of free public access to the retained garden areas.'

This is a highly sustainable and biodiverse proposal, with a 36 per cent biodiversity net gain and 470 new trees planted. Our highest value trees will also thrive under the protection of Tree Preservation Orders that were not imposed on us but actively sought by us.

As well as the Clifton Conservation Hub, the community facilities, and all the other public benefits, 20 per cent of the homes would be affordable, including five, three bedroom family homes: even Clifton can contribute to the city's housing crisis.





**Bristol Zoological  
Society**  
Saving Wildlife Together

I respect everyone's right to have their views heard, but I profoundly disagree with those seeking to block our proposal – if people care about wildlife conservation they should support our plan, and come and visit our New Bristol Zoo to find out all about the amazing work we do.

Yours faithfully,  
Dr Justin Morris, CEO, Bristol Zoological Society



Bristol Clifton and West of England Zoological Society Limited  
Registered in England No. 5154176 Registered Charity No. 1104986

c/o Bristol Zoo Gardens  
Clifton, Bristol BS8 3HA  
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[bristolzoo.org.uk](http://bristolzoo.org.uk)

**STATEMENT IN SUPPORT OF BRISTOL ZOO GARDENS' APPLICATION # 22/02737/  
F ROBERT DURIE OBE FRICS**

Dear Councillors

I have lived and worked in Clifton for most of my life so I know the place intimately as 'home'. I want to counter the false impression objectors are giving that everyone in Clifton opposes the Zoo Charities planning proposal. I feel very uncomfortable with their misleading campaign which may make you think Clifton residents are NIMBYs and therefore wish to put the record straight.

In my Opinion there are many real benefits to this proposal:

- There will be a massive reduction in the amount of car traffic when compared to when the Zoo was open and running.
- Restoring historic buildings on the site will help retain and celebrate the Zoo's presence here.
- Free public access into and through the beautiful gardens is a huge bonus for those who love the gardens as much as the animals – this is a real gift from the charity since it is currently a private space.
- The Conservation Hub will provide a really valuable place for people to meet and get involved in conservation work a vital element of Bristol Zoos Charity mission.
- While Clifton has an abundance of cafes they are actually quite a walk from this Site. So the new café and toilets should be welcomed. The site sits next to the massive Downs public park where the nearest toilets and café are quite a distance away.

Visiting big animals on such a small site did bother me and it is no problem for us all to make such a short journey to the huge new Bristol Zoo where the animals have so much more room to live and roam.

Clifton is where I was born and I feel extremely lucky to have worked and lived for a most of my life in such a green and historic part of Bristol. I believe Clifton Zoo gardens design for change has been extremely carefully considered with a great deal of the site still being green open space.

The new homes look proportionate in height and density.

The inclusion of affordable homes will also make a contribution to Bristol's urgent housing needs.

I commend this application for your consideration

Yours faithfully

Robert Durie OBE FRICS

Shareholder of Bristol Zoological Society

High Sheriff County & City of Bristol 2007

President Bristol Chamber of Commerce 1987

**STATEMENT IN SUPPORT OF BRISTOL ZOO GARDENS' APPLICATION # 22/02737/F****KATHRYN DAVIS, MANAGING DIRECTOR, VISIT WEST**

Dear Councillors,

Visit West is the body that supports the visitor economy and tourism in Bristol and across the West of England, an industry that employs more than 45,000 people across the region.

Along with many of the main Bristol attractions – including Brunel's SS Great Britain and Aerospace Bristol – we fully support the Bristol Zoological Society's plan to redevelop its Clifton site and invest in the New Bristol Zoo at Wild Place Project.

The New Bristol Zoo will be a truly 21<sup>st</sup> century visitor experience, with an opportunity to meet amazing animals face-to-face, and with conservation and sustainability at its heart.

While the small Clifton site has been home to the Zoo for 185 years, the proposal to redevelop the site – with all its constraints as an international visitor centre – has been carefully considered.

Retaining the site as a visitor attraction is simply unviable for a modern attraction, not least with a court decision preventing future parking at the North Car Park, and proposals for bespoke shuttle bus services proven to be undeliverable. The location of the site in a residential neighbourhood is simply no longer sustainable as a visitor attraction.

It is clear to anyone with experience of the challenges of running a tourism attraction that this is the wrong site in the wrong place.

At a local level adding the new free park, curated events, a café, and facilities next to the Downs will certainly help support the Clifton tourism offer, which we also welcome.

We ask you to get behind the West of England's wonderful tourism sector, including the Bristol Zoological Society and its proposals to create a truly 21<sup>st</sup> century zoo.

Yours faithfully.

Kathryn Davis  
Managing Director  
Visit West



**STATEMENT IN SUPPORT OF BRISTOL ZOO GARDENS' APPLICATION # 22/02737/F  
ANNA STEVENS, AVON GORGE & DOWNS WILDLIFE PROJECT**

Dear Councillors

The Avon Gorge & Downs Wildlife Project fully supports this proposal.

For the past 24 years we've been protecting and raising awareness of the outstanding wildlife on the Bristol and North Somerset side of the Avon Gorge and Clifton and Durdham Downs. Our partners include the National Trust, Natural England, Bristol City Council and Bristol Zoological Society. We deliver an amazing engagement programme for schools, community groups and the general public, while helping our conservation volunteers to gain valuable experience.

As part of the Zoo's proposals, Bristol Zoological Society will retain ownership of the current main entrance building, which will become the new Conservation Hub. This is fantastic news for our project, securing a permanent base for our Project and providing a wonderful place for the wider Bristol community to find out about the plants and animals of the Downs and how to help this incredible ecosystem to thrive.

For a while, we have struggled to bring groups to the Downs, as we have not had anywhere for them to meet, gather, have lunch or a cup of tea, or go to the toilet. For many groups and individuals, this is a significant barrier to discovering this unique Bristol site.

The Hub will provide a much-needed space for everyone in Bristol to meet, engage with, learn about and treasure the amazing array of biodiversity we have, literally, on our doorstep.

We will be involving all ages from pre-school, primary, secondary, higher education and throughout adulthood in understanding how the natural world works and our own part in conserving it.

Everyone will be welcome, whether the general public enjoying an expert-led evening wildlife talk, families enjoying the green space on an event, school groups following a curriculum linked session, students writing up their field study data or community groups exploring the Downs and Gorge for the first time.

If you are willing to allow the Conservation Hub as the AGDWP centre it will be a legacy the Zoo can be proud of, something that will benefit the wider Bristol community, and another real contribution to the conservation of our diminishing biodiversity.

Yours faithfully

Anna Stevens

Biodiversity Engagement and Learning Manager

Avon Gorge and Downs Wildlife Project

**STATEMENT IN SUPPORT OF BRISTOL ZOO GARDENS' APPLICATION # 22/02737/F  
GEORGE CUEVAS, FOUNDATION BSC ZOOLOGICAL MANAGEMENT STUDENT**

Dear Councillors

Please let me explain why, as a young person living in Bristol, I fully support this planning application.

The Society doesn't just run a Zoo, it's also – effectively - a university. I am one of about 300 young people studying at the Zoo for undergraduate and masters degrees in zoology and conservation. I am actually studying for a foundation degree in zoological management, which the Bristol Zoological Society runs in partnership with the University of Gloucestershire. It also partners with the University of the West of England.

I love wild animals. My ambition is to be an animal keeper. And the Zoo is giving me the training I need.

And perhaps you don't know, but the Zoo's courses are unique in the UK. For example, Bristol Zoological Society recently created a new conservation leadership masters course. The only other place this can be studied in the UK is Cambridge University. And it will uniquely be the only course in the UK, probably the world, where this is actually done within a zoo.

However, the training facilities at Bristol Zoo Gardens are limited. The New Bristol Zoo will see a huge new investment with proper lecture rooms and the technology that is vital to this learning.

And the number of student places it will be able to offer will double from 300 a year to 600. That means so many more young people, who really care about animals and conservation, will be given a chance to pursue that passion.

So, the move to New Bristol Zoo will allow the Society to start nurturing and training the conservation leaders of tomorrow, at a time when that leadership has never been more greatly needed.

Yours faithfully

George Cuevas



## Bristol Zoo Gardens Planning Application

### Sunand Prasad Committee Statement in Support

Bristol Zoo Gardens—a *zoo* and a *garden*—was extraordinary, indeed unique, in its time. Now we relate to animals and nature in quite a different way, as exemplified by the continuation of the Society’s work at the Wild Place which offers vastly more space for the animals and far better facilities for their study.

The Bristol Zoological Society’s historically significant work depends on raising funds, crucially from the development of the original walled garden. The Society is determined that the development be carried out with maximum sensitivity to the place that the gardens have in Bristolian’s hearts as one of the city’s finest natural treasures.

The zoo has moved; the walled garden will remain. Not only will it remain, but for the first time in 186 years it will be open to access and free for all to enjoy. And many of the buildings will also remain, sensitively refurbished and re-purposed as part of the intent to provide much needed accessible and sustainable homes. These homes—designed in a dignified and un-showy manner—will grow out of the old wall round the site, to leave as much space as possible for the garden, or will mingle amongst the historic free-standing buildings. The landscape design, integral to the proposals, is focused on retaining not only the qualities but also the features that made the Gardens so special. They promise a 36% biodiversity net gain, protection of existing trees and planting of hundreds of new ones, with all the consequent and well evidenced benefits to health and well-being. The buildings and landscape proposals are about living in a new compact with nature; that is what the environmental emergency demands of us. They are also about embracing the future while preserving and enhancing the legacy left to the city by farsighted Bristolians.

Sunand Prasad PPRIBA

Principal, Penoyre & Prasad  
Past President, Royal Institute of British Architects  
Chair, UK Green Building Council

April 2023

*Penoyre & Prasad is now fully integrated with Perkins&Will.*

The Clifton and Hotwells Improvement Society strongly opposes these destructive proposals which are entirely unacceptable in their current form.

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

It is the Society's view that the number of dwellings allowed for represents a massively over-dense development of the site and that, given the provision of only 100 parking spaces, the circular access drive is likely to be permanently littered with cars and so appear very much less discreet than the plans suggest.

In summary, the potential impact on the Conservation Area is poorly considered. That is especially the case in respect of the surrounding listed buildings and their setting which will be compounded by the loss of trees together with the damage to the root systems of many others by infrastructure work.

Chris Jefferies, on behalf of CHIS

## Statement to Development Control Committee A meeting, 26 April 2023

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

The 376 trees at Bristol Zoo Gardens are its most important habitat. According to the applicant's own calculation, they represent 48% of the site's biodiversity value (we say it is much higher), but the applicant is planning to remove 156 of them.

The applicant has used BNG 3.0, a flawed and outdated version of Natural England's Biodiversity Metric, which does not work when calculating the habitat value of Urban trees. The flaws were corrected with the publication of BNG 3.1 & BNG 4.0, which offer the only viable approach to a proper valuation of Urban tree habitat. As BNG 4.0 is the most recent version, we have adopted it for calculating the habitat value of the zoo's trees. We accept the use of BNG 3.0 for all the other habitat calculations.<sup>1</sup>

Please look at the table below. It is taken from the BNG 3.0 Guide to the Biodiversity Metric, used for calculating the habitat area of Urban trees. It is one of the key components in the calculation of the biodiversity value of trees such as those growing in the zoo. However, as we have previously pointed out, this table is unworkable.

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

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

You will notice that this table contains several errors:

1. The heading to the second column is wrong - it should read 'Girth (cm)'.
2. The Area equivalent (ha) value for 'Large' trees is wrong by a factor of ten - it should be 0.0113 ha.
3. No transition point is given between the three tree habitat sizes to enable any of the trees on the site to be assigned to their correct habitat area category. I challenge any committee member to do this in a consistent way. We have modelled three possible interpretations of this table, all of which produce very different results.<sup>2</sup>

The applicant has used this table to calculate the habitat area of the trees growing at the zoo. Despite our requests, the applicant has declined to say how it has applied this table. It is also disappointing that the Council's Nature Conservation Officer has not addressed this issue.

The applicant's Urban tree habitat calculation cannot be relied on because they use this unworkable table. This is why we say that the applicant's proposals will result in a net loss of biodiversity<sup>3</sup> if they are allowed to proceed, as they have undervalued this important habitat.

<sup>1</sup> <https://bristoltreeforum.files.wordpress.com/2022/06/bristol-zoo-gardens-btf-comments.pdf> page 5, last para.

<sup>2</sup> <https://bristoltrees.space/trees/developments/analyse-BNG.xq?name=zoo>

<sup>3</sup> -22.24% using BNG 3.1 & -12.52% using BNG 4.0

**Name:** Avon Needs Trees

**Comment** for application: 22/02737/F Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

**Commenter Type:** Environmental charity

**Statement subject:** Objection to the Planning Application

“Our city’s wildlife, ecosystems and habitats are vitally important to us all, as the loss of biodiversity affects our lives in many ways, from the insects that pollinate our food to the green spaces that enhance our resident’s health and wellbeing.”

*Bristol City Council One City Ecological Emergency Strategy, 2020*

“We are facing a climate emergency. As a city we need to act now to reduce direct and indirect carbon emissions to net zero.”

*Bristol City Council One City Climate Strategy, 2020*

### **Overall Comment**

Avon Needs Trees finds planning application 22/02737/F Bristol Zoo Gardens in contradiction of Bristol City Council’s One Climate Strategy and its 2020 Ecological Emergency Strategy. The application’s proposed felling of around 200 irreplaceable trees at this, a site of significant ecological importance close to designated conservation areas, is unacceptable – and flies in the face of BCC’s commitment to double Bristol’s tree canopy by 2046.

This is compounded by the insufficiency of plans to plant two trees for every tree lost. Trees store little carbon in their first 6 years, consequently the felling of Bristol Zoo Gardens’ mature trees significantly undermines Bristol City Council’s highly stretching and ambitious commitment to become carbon net zero by 2030.

Hundreds of tonnes of carbon are at risk of being released if these 200 irreplaceable trees are felled. An insignificant fraction of this carbon would be stored by 2030 under the plans to plant 400 trees new trees in their place.

Avon Needs Trees queries whether the 29 Tree Protection Orders Bristol City Council has put in place, and the planned felling of 200 irreplaceable trees, is consistent with Bristol Zoological Society’s March statement that they are “committed to looking after the native plants on site”. Alongside the shortfall of biodiversity net gain the planning application is projected to secure, based on Bristol Tree Forum’s robust assessment, BZS’ calculations, assertions and assurances for nature recovery already appear to lack credibility.

In summary, as a local charity that has planted some 14,500 trees in the Avon catchment over the last planting season, Avon Needs Trees supports rejection of the planning application 22/02737/F due to its impact on Bristol's climate emergency and ecological emergency commitments.

Best wishes,

Dave Wood (he/him)

**Director**

**Avon Needs Trees**

## Bristol Zoological Gardens

I am Richard Pedlar, a retired conservation architect, and a former Director of Richard Pedlar Architects. As conservation consultants the practice has been instrumental in helping to rethink the future of many heritage sites in Bristol including the Observatory on Clifton Down.

Set within the Clifton and Hotwells Conservation Area, the zoo is a rich multi-layered heritage site with a unique urban presence, a curated and managed exotic character and distinctive listed buildings. Unless it is fully understood, and appropriately protected its collective significance and intrinsic character will be lost forever.

The zoo enclosure is a conspicuous component of a diverse urban scene known locally, regionally and globally. Within an extraordinary surrounding landscape, it has past and contemporary relevance. Understanding this heritage underpins the stewardship of the place as a whole and presents opportunities that are yet to be purposefully explored. The intrinsic value of this asset, set within the rich and diverse Conservation Area must not be underestimated.

So, where does its significance and intrinsic material value lie? It lies within the high surrounding perimeter walls which mean:

- The site is not overlooked.
- It is free from cars.
- It is a safe space where people and nature can flourish.

Protected by the walls is an exotic wonderland of nature, novelty and human ingenuity. It brings together aspects of the natural world, of plants, trees, animals, birds, ecology, science, art and architecture.

As a destination the zoo contains an ambience of beauty, distinctiveness, and infrastructure that entertains and delights, whilst offering an environment for research and learning.

If the perimeter walls are breached the integrity of the asset is lost.

Proposed housing and vehicular access undermine the very significance of this historic amenity. Interventions must be subservient and preserve or enhance the intrinsic character and unique identity of the site.

I urge you to reimagine how this special place might continue to inspire present and future generations.

Richard Pedlar 21st April 2023

It is hugely disappointing that the recommendation goes against the Development Plan and the principles of the Conservation Area.

The exterior design is totally out of keeping with the surrounding area and the VISUAL HARM scar has been traded off.

**Surely there is a better way forward, more respectful to Clifton - to approve the plan in principle BUT subject to an EXTERIOR design that is in keeping with the distinct heritage of the local environment.**

The Zoo has a long association with Clifton and will make millions from a redevelopment. It does not seem at all unreasonable to request that a small proportion of the potential proceeds is used to make sure the legacy left is architecturally in keeping with the Conservation Area."

Kind regards

Robert Lee



### Bristol Zoo Gardens Objections to Planning Application 22/02737/F

**I object in full** to the above planning application which will have an overall negative effect on Bristol on the following grounds:

1. **It contravenes both policy in the Bristol Local Plan and in Bristol City Council's Local Plan** Review of November 2022, particularly parts of chapters 5 (**Affordable Housing – see my note at bottom**), 6 (Net Zero & Climate), 7 (Biodiversity & nature Recovery) and 10 (Design).
2. **It contravenes the National Planning Policy Framework (NPPF)** on biodiversity (natural environment guidance on brownfield land of environmental value [Paragraph: 003 Reference ID: 8-003-20190721] and Green Infrastructure [Paragraph: 004 Reference ID: 8-004-20190721 & Paragraph: 005 Reference ID: 8-005-20190721, revised July 2019]) climate change and CO2 reduction.
3. **Serious loss and harm to Bristol's Economy** - the Wild Place Project proposed as an alternative to Bristol Zoo Gardens is in South Gloucestershire and not within the Bristol City Council area. The consequences for the city by closing such an iconic major attraction means a serious loss of income to Bristol's economy which the Bristol Zoo and Zoo Gardens has provided for generations over almost two centuries at the Clifton site. As an added attraction also it is close to Brunel's iconic suspension bridge which has become the symbol of Bristol.
4. **Spurious and disingenuous accounting figures** have been used as a justification for closing the zoo. The Zoo has maintained that it was losing money, as a justification for selling the site, giving as an example 2021 when it says it lost over £1m. That year it did, but it was the year when the Zoo had to close by law due to the covid pandemic, so that year it was inevitable that it lost money. The Charity Commission's figures on its website clearly show that Bristol Zoo was not in annual financial deficit and had not lost money in any of the recent years except 2021, yet this pandemic year is the precise year's figures the zoo is trying to use to justify selling the site.
5. Since the Zoo Trustees consider that finance is a major problem, serious questions must be asked about the financial management of Bristol Zoo Gardens. If alleged financial deficit was their concern, why on earth did the Zoo trustees close the Zoo at the beginning of September 2022? Nothing has happened on the Clifton site since then, yet some animals and the staff to care for them continue to remain on the site 8 months later at a huge negative cost and financial loss to the Zoo, when the Zoo could easily have remained open to the public and making money for it. It makes no financial sense at all. Also, the new café & restaurant called The Hide was built brand-new only just a few years ago, yet under the Zoo's proposals it is now to be demolished, meaning that a huge amount of money in building it was wasted, thus showing the Zoo's financial judgment to have been woefully lacking. Similar comments could be made about other recent improvements on the site.
6. **Loss of Amenity to Bristol City.** Bristol Zoo and its gardens have been a major attraction and welfare benefit for generations of Bristolians. It has provided a calm, recreational and educational space for Bristol's citizens and its children. Schools too have used the Zoo as such for generations as part of learning and teaching children about animals and the wider world. The Clifton Zoo is easily accessible from the city centre by bus which stops right outside the main gates, reducing the need for car use and so reducing the impact on CO2 emissions and

climate change. Let us not forget that Bristol was the first place in the country to declare a climate emergency...

7. **Loss of Heritage.** The applicant's own heritage report states: 4.4.2 Highest significance "The zoological gardens site is unusual in that the element of highest heritage significance is arguably its communal value, rather than its architectural, archaeological or historic interest. The site's near-two hundred year association with family days out, childhood adventure, and special activities and events is of huge significance both to the people of the City of Bristol and the nearby area, but also to visitors from far further afield".
8. Proposed demolition of parts of listed buildings, including the aquarium buildings and the total demolition of the gorilla in enclosures incorporated in the iconic Giraffe House are unacceptable and undermine their listed building designation.
9. **The Victorian Society's report** concludes that: 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.
10. Damage to an area of conservation. The Clifton site is in an area of considerable architectural importance and the area is a conservation area. Creating new buildings such as proposed will have an overall negative effect on the architectural ambience and amenity of the area. In particular, the creation of high rise blocks of flats goes against the general low level of older buildings in the immediate vicinity. Neighbouring properties in particular will suffer from a negative aspect to their immediate surroundings if this proposal is allowed to proceed.
11. **Environmental Damage.** There are negative effects with this application's proposals: Bristol Zoo Gardens has been nurtured for almost two hundred years, and has become a haven for various rare and unusual trees and plants. Some of these will be lost altogether, and those which will be moved may not survive transplantation. The Gardens themselves have won awards and their layout will be lost forever.
12. Considerable space in the proposed development will be allocated to car parking and to car use, directly contravening national and local policy on reducing CO2 emissions and reducing impacts on climate change. The site and surrounding area will suffer increasing car congestion and atmospheric pollution due to the number of residences which will be built, and have a negative effect on air quality. Bristol has recently introduced a clean air zone. Increased car provision and use within the city is directly contradictory to the clean air policy of the city council. The idea that some of what are now footpaths within the Zoo Gardens site should become shared with cars sends the wrong message on climate change as well as posing risks to pedestrians' personal safety. The area of green recreational space available to the public will be considerably reduced, to public detriment. There is also no guarantee that the reduced green space which does remain open to the public in this development will remain open in the future. Experience shows that once a public site is sold off and becomes private land, sooner or later the public will be stopped from being able to use it as a public space. Many people who formerly would have travelled to the Clifton site by bus will not come to the site in future. If they wish to see animals, they will have to travel a considerable distance to elsewhere and will have to travel by car to the detriment of the environment.
13. **Bristol Citizens' Health and Welfare.** We have long known that open green space, unencumbered by vehicles is beneficial to people's health and well being, particularly their mental health. This is true even more so when people are also able to be in contact with

animals. Loss of the Zoo and gardens will therefore negatively impact on Bristol citizens' health and welfare.

In its conclusion, the council officers' report to this committee states: "Taking the policies of the development plan as a whole, overall, it is concluded that the proposal is not in accordance with the Development plan".

#### NOTES

**1: The proposed development does not in reality provide the opportunity for Affordable Housing.** The council's own Housing Delivery Team states that its normal proposal in the rich area of Clifton ward where Bristol Zoo Gardens is sited, "The site falls within Clifton ward, which is in Inner West Bristol. In accordance with policy BCS17 the site is required to deliver 40% affordable housing" – in other words 40% of any development in Clifton ward should be affordable housing; but the council has inexplicably halved that to only 20% on the basis that "the site is eligible to make use of the 'Threshold' approach to BCS17 added by the AHPN that applies to the Inner East and West areas". This exemption is clearly intended to apply to the poorer areas of the East of Bristol's inner city and the poorer part of the West of Bristol's inner city – it is quite clearly not meant to include the richer part of West Bristol's inner city (i.e. Clifton ward) which is where accommodation to both rent and buy is the most expensive in the whole city, and indeed in the whole South West urban region. Therefore the council is in effect breaching its own rules in requiring only 20% affordable housing on this site..

2: National planning policy guidance on the Natural Environment states that: "Some previously developed or 'brownfield' land is of high environmental value, providing habitats for protected or priority species and other environmental and amenity benefits. When allocating land for development or determining a planning application, the biodiversity or geodiversity value of the land and its environmental sensitivity will need to be taken into account so that any harm can be avoided, mitigated or compensated for in a way which is appropriate given the site's identified value". (Paragraph: 003 Reference ID: 8-003-20190721). It also states: "Green infrastructure is a natural capital asset that provides multiple benefits, at a range of scales. For communities, these benefits can include enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes, food and energy production, urban cooling, and the management of flood risk. These benefits are also known as ecosystem services" (Paragraph: 005 Reference ID: 8-005-20190721)

Clearly the Bristol Zoo Gardens site falls within these descriptions, and the proposed development will severely reduce the existing area of the site for public access and restrict its public use. Over time, experience shows also that such access as remained if the development were completed would further be eroded. Given that the Zoo Gardens has been a public access site for almost 200 years, this is no small consideration. Mitigation elsewhere cannot compensate for such a precious and historic public resource.



**Bristol Zoological  
Society**  
Saving Wildlife Together

**STATEMENT IN SUPPORT OF BRISTOL ZOO GARDENS' APPLICATION # 22/02737/F  
CHRIS BOOY, VICE-CHAIR OF TRUSTEES BRISTOL ZOOLOGICAL SOCIETY**

Dear Councillors

As Vice-Chair of the Trustees of the Bristol Zoological Society, I respectfully ask you to support your officers' clear recommendation and approve our application.

As trustees we have a serious responsibility to oversee the direction and decisions taken by the Society's executive, supported by professional advisors, and we remain accountable to the Charities Commission in doing so.

The decision to close the Zoo Gardens was not taken lightly. In reaching our decision we had to look not just to the past, but to the future as well.

Regardless of objectors' attempts to portray the Society as rolling in cash, the financial situation had been deteriorating year-on-year, with operating losses in four of the past six years, and a 35 per cent decline in visitor numbers to the Zoo Gardens between 1999 and 2019, before the pandemic (459,721 visitors in 1999; 323,387 in 2019). Clearly this was unsustainable.

In 1836 it must have seemed like an excellent idea to open a Zoo on what was then the edge of Bristol. But rather than looking nostalgically to the past, we must now look to the future.

The Bristol Zoological Society has changed enormously over the past two centuries. Our mission is clear: to save wildlife together. Our New Bristol Zoo – which is eleven times larger than our Clifton site - will provide habitats and spaces the animals need, and allow us to broaden, deepen and expand our conservation work locally, nationally and globally.

Our strategy has the support of the CEOs of every conservation zoo in the UK, as well as European and global zoo federations. With respect, I'd suggest these experts know more about running zoos than some of those speaking against us.

I cannot see how anyone who cares about the animals or conserving our planet would not support our plans.

Thank you.

Yours faithfully

Chris Booy

Vice-Chair Trustees Bristol Zoological Society





Dear Councillors,

We have worked incredibly hard – with the support of your Officers and other key stakeholders – to put a highly sustainable and sensitively-designed mixed use scheme before you.

The design has been shaped by the character of the site from the outset. We invited BCC and Historic England to independently assess the natural and built heritage of the gardens, so that our designs would not just take account of them but showcase and enhance them. As a result, three additional historic structures became Grade II listed and Tree Preservation Orders were put in place for the highest value trees, including the Monkey Puzzle and Wedding Cake Tree.

The landscape design showcases these historic features along with others that make Bristol Zoo Gardens such a special place. The Bear Pit and the Monkey Temple will be restored and revitalised, the Grand Terrace, Lake, and West and East Lawns remain and are celebrated in the landscape, and the Listed entrance building will become a Community Hub with Café and a permanent base for the Avon Gorge and Downs Wildlife Project.

Within the site, characterful existing buildings including the Clifton Pavilion, the Activity Centre and adjacent Parrot House Aviary, the Giraffe House (currently home to our Gorillas) and the Clock Tower building will be carefully restored and transformed into 18 new homes and a large nature inspired playground introduced.

Today, the gardens have a rich and varied tree canopy, but overall and particularly at a lower level, they are relatively poor in biodiversity. Our landscape proposals introduce a rich and diverse plant palette of local and endemic species including bespoke meadow mixes to compliment those found on the Downs, and the lake is enlarged and improved. This all helps us to reach a Biodiversity Net Gain of at least 36%, far exceeding even emerging policy, and create a public park that will deliver health and wellbeing benefits to those who visit.

Architecturally, 151 apartments will be built in new perimeter buildings, all using carefully selected high-quality materials. The perimeter buildings will be built in a rough textured brick and are visually broken up by the use of step down or back relief, balconies and animal motifs.

22 new houses are proposed within the Gardens, and here the design echoes the other-worldly sense of this special place, with the Lake Houses built with green glazed bricks and taking architectural references from the Giraffe House.

All dwellings (new and converted) are sustainable and accessible homes that perform well against the Urban Living SPD guidelines. The vast majority are dual aspect and of the 28 single aspect none are north facing.

Within the gardens, the public private boundaries are carefully and subtly managed through landscape features and architectural design. The relationship to neighbouring streets has been carefully considered, with the introduction of planted buffer zones and offsets to the perimeter wall to maintain privacy and prevent overlooking.

Traffic flows in the surrounding streets will be significantly lower than for the zoo and your Transport Officer has confirmed the proposals do not present safety concerns. Within the gardens, the design minimises vehicle movements and car parking is limited to 120 spaces; there is provision for 535 cycles.

I hope you agree that this is a highly sensitive and sustainable design which will deliver much needed homes and enduring public benefits for future generations of Bristolians.

Francesca Fryer  
Director of Transformation  
Bristol Zoological Society



c/o Bristol Zoo Gardens

Clifton, Bristol BS8 3HA

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## **STATEMENT TO BRISTOL CITY COUNCIL PLANNING COMMITTEE – 26<sup>th</sup> April 2023**

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

#### Principle of redevelopment

Our statement relates to the current application for planning permission and we are not here considering the business case for the move of the Zoo from this location.

The Zoo Gardens are designated as public open space in the development plan and on reflection the Society is not convinced by the current plans to partially develop the site for housing whilst retaining open space as publicly accessible gardens.

The Society questions who will wish to visit the site when it is surrounded and dominated by private housing. The special character of the existing Gardens will be further eroded with vehicles accessing an area where no vehicles have previously been permitted, both passing through the open space and parking there on a permanent basis. The verdant nature of the area will inevitably be completely transformed.

In addition, there will be the challenge of maintaining such a significant area of open space, presumably paid for by service charges on future residents. There will be inevitable pressure to create a gated community at some point in the future.

The Zoo Gardens currently provide an oasis of calm that has been enjoyed by Bristolians for generations. We consider that they are of such special environmental and historical importance that they should be retained as a fully accessible public asset.

### Detailed response

Nevertheless, if the development in something like its current housing plus open space form is accepted, we have the following comments.

The retention of open space for future public access (even if used less than if it was completely open space), and the reuse of historic buildings, are positive proposals. The proposed Conservation Hub is welcome. However, in the Society's view the current proposals fall short of the stated aspirations in a number of ways.

The Society has reservations over the heights of several of the proposed residential blocks. These reservations concern the impact of the heights of the perimeter blocks on the wider conservation area and on the internal character of the gardens themselves. The latter concern also applies to the town houses arcing around the lake, albeit to a lesser extent.

The Society also has reservations about the quality of the architecture, and notes that others have also expressed the view that this site deserves building design proposals which make a much more positive contribution to the appearance of the Conservation Area and to the setting of Listed Buildings. This particular issue remains a critical aspect when making an overall assessment of the case to change the main use of the site.

### Vehicle access, circulation, and parking

The Society is disappointed by the lack of ambition with respect to future car ownership and parking. Surely this well-located site has the potential to become an exemplar for a car-free development. The developers' own plan showing "resident routes to key local facilities" provides very real evidence that key local facilities are all within easy walking distance.

The need to provide circulation routes and undercroft parking areas makes the development much more invasive in terms of its impacts on the gardens than would be necessary with a car-free scheme.

Securing agreement to implementation of approved scheme It is absolutely fundamental that if the BZS truly want to deliver a legacy consistent with the principles it published, then it should commit to binding any future developer to the proposals.

## Representation Statement by Gerry Swarbrick.

Chair: Clifton, Clifton Down, Hotwells & Harbourside Neighbourhood Forum

### Planning Application for Bristol Zoo Gardens: DC A Committee 26<sup>th</sup> April 2023

I am the co-chair of the Neighbourhood Forum that combines the communities of Clifton, Clifton Down, Hotwells & Harbourside. The area from Brunel's famous SS Great Britain all the way up to the Clifton Downs and including Bristol Zoo Gardens.

I am speaking in that capacity as a legitimate representative of the local community; although everyone recognises the wider significance of this heritage site; an icon of the cultural strength of Bristol and its historical importance to the whole of the United Kingdom. These are not my words, but they convey what my fellow neighbours say repeatedly.

When I became aware that the Zoological Society Trustees had radically altered their own strategy and plans and were intent on abandoning the Zoo Gardens site, I arranged for the subject to be covered at Neighbourhood Meetings and I tried to facilitate a debate.

I consider I have a duty to make the committee fully aware of the breadth and strength of feelings expressed at those community meetings and this is my attempt to capture and relay the general weight of opinion from the community and neighbours that I meet and speak to.

I could dwell on a multitude of subjects and responses from the community but I am mindful that many specific issues will be covered by others contributing to this dialogue and who are speaking today. By way of a very shortened summary, these comments include:

Why has the Zoo not engaged in an open dialogue with the Clifton and wider Bristol community?  
Why has the Zoo kept secret the contents of a KPMG report and not shared the range of potential options made known to the Trustees?

Why is the Zoo showing so little regard for the heritage and economic value of the site in Bristol?  
There is general recognition that arguments put forward to justify the closure of Bristol Zoo are false and no attempt has been made to explore and debate the range of alternative options?

There is a widely held belief that the Zoological Society is pretending the Bristol Zoo Gardens are not viable; when there is a great deal of evidence that they are viable.

Is the committee aware of the very large volume of letters objecting to this application?

It is not sustainable to create a new destination for thousands of car journeys to beyond Bristol.  
The Zoo Gardens contain so many wonderful and mature trees and surely they must not be lost.

Bristol Zoo belongs TO the city of Bristol and Bristol Zoo belongs IN the city of Bristol.

The application should be rejected and more time and public debate given to devising a better future for Bristol Zoo Gardens.



**Statement in opposition to planning application no 22/02737/F Bristol Zoo Gardens**

This application proposes that the unique community and city heritage asset of Bristol Zoo Gardens is effectively turned into a luxury private housing estate, as a result of the scale of the proposed development. The level of damage to this community asset means the proposal should be rejected. It is common practice that a developer's initial proposals are excessive, and get the balance wrong between the developer benefit and the community benefit. Indeed this is what the officers' report itself states on page 167 of the public reports pack:

"The proposal's scale and massing means that the proposal cannot be considered to be well designed in the context of paragraph 134 [of the National Planning Policy Framework] and suggests the proposal should be refused."

Reducing the scale and massing of the development would retain more of the character of the community heritage asset of Bristol Zoo Gardens, as would reducing the number of car parking spaces associated with the development.

I ask that the Development Control Committee members reject this proposal and that the developers return with a more appropriate application.

Jerome Thomas

Hi

Here is my statement for public forum for the meeting this week.

I will be away on Lord Mayor duty on Wednesday but I have written to the Chair and he has said that he will allow Katy extra time to speak to my statement.

Thanks

#### STATEMENT TO THE DC FOR THE ZOO APPLICATION.

Like so very many of my residents in Clifton, I am sad at the loss of the historic Zoo and recognise that the loss of this amenity is a harm to the area. However, the Zoo Trustees have decided to pursue their conservation aims at the larger site and therefore an alternative use for the site must be found.

The site is designated a Important Open Space and is in a historic conservation area, so great care should be given to the design of any proposal and a consideration of the loss. While I commend the communication and consultation done by the Zoo on the proposal, I do regret that they did not consult on alternative uses and only gave residents the opportunity to comment on the residential development.

I am pleased that the proposal opens up the walled gardens and, for the first time, will allow public access, free to all. I am assured that the s106 controls will be strong enough and has legal weight to ensure that the gardens remain open to the public in perpetuity (only the Secretary of State can make a change) but I will continue to press the Zoo Trustees to place restrictive covenants on the land sale, further guaranteeing public access. In our meetings with the Zoo team, we stressed the need to create permeability which would encourage people to use the gardens as a through-route, so we are pleased that the entrance and egress points provide those desire lines, so that people are encouraged to walk through from the Downs to the Village, using the gardens.

Personally, I think that there is much to admire in the designs although I do accept that the majority of my residents disagree with me and find the design of the terraces to be overbearing and monolithic. I do also accept that, if there were fewer houses in the centre of the gardens 'there would be less of an impact on the open space and more opportunities to provide open space'.

Personal opinion aside, the proposal is contrary to DM26 and DM27. The height, scale and massing is too great and fails to take the local context into account, so I think it should be turned down on this ground.

While I understand that the opportunity to maintain the gardens, over the long term, and at no cost to members of the public has merit, I believe that the Zoo team have not fully explored the options of how this could be achieved. This has led them to applying a formula for the management of the grounds which led to the quantum being too high. The quantum of 196 units is, we are told, necessary to allow for a management fee that residents would be prepared to pay. The benchmarking that the Zoo first used was challenged. Other options could and should be considered.

The massing is contrary to our policies (DM26 and 27), so we are being forced to accept a development with massing and quantum too high for the local context and we are being asked to accept this by the Zoo, as they don't want to bind the future owners of properties on the site to excessive management fees. Nor do they want to explore the option of creating a trust, using profit

from the sale of the land, to part-fund the maintenance of the gardens and allow for fewer units on the site. Since the closure of the Zoo was announced, I have been arguing that the Zoo can apply to the Charity Commission to accept 'best benefit' rather than 'best value' and I think this is a good example of when this exception could be requested. We do not want a development with a too-high quantum when alternatives are available.

I believe the Clifton Conservation Hub will be a real asset to the area and will have good community use, as well as offering toilets and refreshments for those visiting the Downs. I am glad that the Zoo will retain ownership of this area and will continue to use this hub for education purposes. The cultural programmes which could be delivered on the site will also be an added benefit to citizens of Clifton and the wider city.

I return to the point on the quantum and massing and agree with the Urban Design team who suggest breaking down the massing of the terraces to create a more 'villa like' appearance would be more fitting in the context and would then be within our own policies.

I like a lot of what the Zoo team have done and I believe that they are well intentioned in their efforts to meet the conflicting tension of achieving a funding stream for their new venture while leaving a good legacy in Clifton. I think they are close to success on this, but not quite there yet. They need to reduce the massing and quantum so that the development would add to, rather than take away from, the local character and distinctiveness. I urge you to refuse this application on the grounds that it breaches our own policies DM26 and DM27.

Councillor Paula O'Rourke

I submit the following statement to Committee A on Wednesday 26th April

*I request to speak as a grandfather, and as a shareholder of Bristol Zoological Society having been entrusted with a share by one of several shareholders who have voiced their deep concern about the potential loss of these protected walled gardens to blocks of flats and cars. I also speak as part of a diverse team that created the 'OurWorld Bristol' proposal as just one deliverable example of a more appropriate development of the site that would continue to bring millions of pounds worth of eco-tourism benefit to the city. Our submission of the 'OurWorld Bristol project' for a Pre Planning Application resulted in a favourable response and remains very much alive. However this, and other such sustainable alternatives, will be lost forever if the site is given an artificially high value by what is an extremely intrusive proposal. This is so out of step with both the character of the Conservation Area and Bristol's stated ambitions to face up to the ecological emergency declared by the Mayor in 2020.*

*Nothing but the best is suitable for this Bristol jewel and your own planning officers have admitted that the passing of what you have in front of you would be a compromise, not least because future access to the public to just one third of the site cannot be guaranteed by planning conditions or promises and will almost certainly be lost when future residents object to noise and nuisance. This is a scheme that has been devised by property agents to increase site value, while making a derisory contribution to Bristol's affordable housing need. It fails to meet even the most basic criteria for sustainable development as defined by the National Planning Policy Framework leaving no fear of a successful planning appeal should you decide to refuse. I ask you for the sake of our children and grandchildren to put the welfare and reputation of our city first by rejecting, or at the very least delaying, a decision until a proposal that Bristol can be proud of is brought before you.*

I would be grateful for an opportunity to speak to this for one minute.

**George Ferguson**

I am writing in a private capacity but with bona fides from the heritage world as a Council member of the National Trust and as former Chair of the Society for the Protection of Ancient Buildings.

Historic places and buildings matter to people. We all know this both instinctively and as it affects our daily lives. Local, national and international legislation exists to protect it and our own current guiding document, the NPPF, says that great consideration and weight should be given to the conservation and setting of our heritage before irreversible decisions are made that affect it.

Why is the historic environment important? It gives people a sense of place, of attachment, of identity, of memory. The people of Bristol know their bridges and the people of Newcastle know theirs. It provides the landscape for our daily lives and a city's old buildings are without exception those which are most valued and appreciated. It generates civic pride and responsibility. It connects past, present and future.

And there are substantial economic benefits; tourism, nightlife, universities and even new business start-ups all thrive in an environment with a high heritage index. The Zoo has been Bristol's most successful visitor attraction for nearly two centuries. It has pulled in millions of pounds to Bristol's economy. Is there really no case for business continuity as a cultural visitor attraction? The Zoo's own figures have been widely challenged and their 'case for closing' is flimsy. If there is a failure at the Clifton site, it is more through poor management than lack of demand.

The benefits of heritage to society are so well understood that its destruction is commonly used as a weapon of war - you destroy a nation's identity by destroying its landmarks<sup>1</sup>. We are horrified when statues are defaced (Baghdad Museum) or blown up (the Bamiyan Buddhas). That is why citizens are often so keen to rebuild those familiar features when a war ends, for example the Mostar bridge in Bosnia, or the Frauenkirche church in Dresden. There are groups already in the Ukraine planning for reconstruction.

So why, in peacetime, do we allow this death by a thousand cuts of losing our heritage piece by piece to one force alone - the greed of developers? That's our equivalent, that's how we do cultural destruction in peacetime in the UK. The Zoological Gardens are a long-standing cherished cultural feature and the Committee must not allow them to be blown up.

We have a good planning system in the UK, reasonably democratic and transparent, decades of experience, but the outcomes are too often the result of a well-resourced industry against stretched council departments and where the voices of people and experts are heard, but apparently not listened to. The window of what is acceptable has moved too far in favour of demolition and redevelopment, while the devious measure of 'less than substantial harm' is used too widely to let schemes through. The Case Officer is fundamentally wrong when he says the impact to the site overall is will be less than substantial. The special qualities of the Zoo site would be irreversibly lost through this scheme.

The NPPF states: 'As heritage assets are irreplaceable, any harm (whether substantial or less than substantial) is to be given great weight, and any harm to, or loss of, the significance of a designated heritage asset ... should require clear and convincing justification.' But that is not happening here. The Zoo site which is enclosed, traffic free and, lest we forget, the fifth oldest zoological gardens in the world will be cracked open and turned into a banal housing development. Its overall significance will be lost and the listed heritage assets dwarfed and cut-off from their purpose. To say it is acceptable that they endure as 'follies' is an insult to their creators and their long record of functional service.

The Zoological Society has made its priorities clear: to pursue animal conservation work at any cost. It clearly feels no sense of duty to the city itself (which will lose out economically) or to Bristol's heritage. They talk as if they will have significant influence over the site once they have sold it, when in practise they will be a minority stakeholder in a commercial concern. And business is one thing the Zoo has shown it is pretty poor at.

Why has the Zoological Society let the Zoo run into the ground, when it could be reimagined and kept in service as their main revenue stream? It can be noted that Colchester Zoo and Noah's Ark among others have managed to recover and emerge from the lockdown years, without selling off key assets.

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<sup>1</sup> The Destruction of Memory: Architecture at War. 2016. by Robert Bevan

Do we want the city to lose everything that makes it unique? To turn it into a sea of shops, office blocks and student accommodation. Will the diggers move in on College Green one day? Where does it stop and who will stop it? This loss, of things of permanence, interest and value, to the mundane and short-term does not go without notice. Liverpool has lost its World Heritage status and Bath teeters on the brink of the same cancellation for one reason alone: the over-sized and over-eager commercial development of historic sites.

The Zoo site will not be the same in any way, after development. People, let alone half a million visitors a year, will not cross town to look at it or sit in it, overshadowed by great blocks of flats. It has been noted that the open space and public access cannot be guaranteed for even the short term, let alone a further 185 years. It will be a private housing estate and Bristol will have neither a Zoo nor the much trumpeted public park.

There is a degree of familiarity breeding if not contempt, then at least complacency. Visitors to places like Bristol and Bath coming from places without a rich heritage are overwhelmed by it and cannot imagine that we would ever willingly part with any small piece of it. We need to see our familiar city through their eyes perhaps and be far more reluctant to demolish our heritage, especially when it is unnecessary.

Finally, and as the NPPF directs, the scheme can and should be rejected on the grounds that it is 'badly designed development' as we saw the Secretary of State asserting in the Berkely homes scheme in Kent last week. It neither fits with 'the overall form and layout of their surroundings' (the local conservation area), nor does it provide outstanding or innovative design'. It does not 'promote high levels of sustainability' and does not 'raise the standard of design more generally in an area'.

Councillors are pressed on all sides with short term concerns, but with heritage issues the long view must be taken and resistance applied to development. It's a big ship that needs turning but we need to change direction.

The Committee has an opportunity to be remembered not as the group that allowed this precious site to be lost to Bristol, but to be cheered by its successors in 2137 when Bristol celebrates its '300-year old Zoological Gardens'.

I urge you to reject this application which will encourage the Zoo's Trustees to reconsider their strategy.

**Public Forum Statement for Planning Ref 22/02737/F**

**City Hall, Weds 26 April 2023, 2pm.**

**Mrs Georgina Harford**

I object to this planning application.

The disproportionate scale, density and resulting bleakness of the buildings are a travesty of the trust that has been put in the hands of the Applicant.

As the Victorian Society has explained so carefully, this zoo site is very rare. It continues to be much loved by generations of people from both within the City and the wider region.

It is noted that the architects, Penorye & Brasad, are now merged into an enormous international business, far removed from the beloved, idiosyncratic zoological gardens of Bristol.

The City is already burdened by much poor building design from the 1960s. This specific site is the right place for top quality housing design. Anything less will remain a lost opportunity.

Public statement.

Former Bristol zoo site .

Whilst we understand the reason for the closure of Bristol zoo on the Clifton Down site and the movement to the wildlife place Bristol zoo vision project The wild place site allows for better animal care and welfare.

We welcome the retaining of the Gardens as a public open space

For residents and tourists and the retaining of the listed buildings as housing provision.

We are concerned about the lack of provision within the zoo garden which will attract visitors being close to the Downs of an provision of public toilets or cafe provision.

As people will visit the gardens the paths must be fully accessible for wheelchair users and people with reduced mobility.

Mother and father with buggies

There is a major need for more housing provision within the Bristol city Region

And especially affordable housing.

With regards to Housing provision

We welcome the 196 new homes and the provision of affordable housing .

and the 20 % provision of housing to rent the number of m43 and m42 standards is be welcomed but fully accessible disabled housing is at a small numbers.

But we welcome the provision of 50 homes being built as wheelchair accessible.

Clifton and Bristol west require for affordable social housing so people can remain in the Clifton area

.

We do feel the housing and flat design is poor in the Clifton conservation area.

It would have been welcomed to see buildings and architecture in keep with Georgian and Victorian buildings.

But we welcome home to be incorporated within former zoo site and gardens.

On Transport we welcome the green travel plan but there appears to a view that the bus service are all commercially viable service 8 Bristol Temple meads station, shopping centre and city centre park street to Clifton village.

But bus service long Ashton park and ride Clifton village, Clifton Down to Southmead hospital bus station.

Is a west of England mayoral combined transport Authority supported service.

Mayor Dan Norris.

Service funded by the Bristol city council.

But no 106 money appears to have been asked for bus service at a time when the city Region bus Network is being cut by 33 bus services.

But a green travel plan need negotiated with the Zoological society.

No provision appears to be made to provide a bus link from Bristol city centre Clifton Down station the Downs and the Zoo site to Westbury on Trym, Henbury Blaise castle estate Henbury station metro west cribs causeway bus station and wild place Bristol zoo project .

Cycling and walking provision is welcomed.

We also share the concerns by Clifton College of the movement of vehicles

In college Road , Guthrie Road and the coach and bus access is taking account of for the college students.

There is a need also for safe crossing points.



Whilst it is sad that Bristol zoo has closed but the new zoo site in North Bristol a wild place Bristol zoo project

Provide better facilities for the zoo animals.

The zoo Garden are retained with access for local residents and tourists to the Downs.

The listed building are retained as part of the housing Development.

and Bristol gains 196 new homes.

So we welcome the Development of the former Bristol zoo site .

Whilst there is talk of a new Eden Project in Bristol on the zoo site no such planning proposals have come forward.

So we welcome this proposal for the zoo Garden and Housing with some disabled housing but would like to a better Green travel plan.

David Redgewell South transport Network and Bristol disability equalities forum trustee.

Gordon Richardson Bristol disability equalities forum.

We will be attending the meeting to speak .



## **Comment on the Clifton Bristol and West of England Zoological Society application for development of the Garden Site**

The decision of the Bristol, Clifton and West of England Zoological Society (the Society) to close the zoo in Clifton has caused great sadness for Clifton ward residents, neighbours of the zoo, and for all those who have visited the zoo through the decades. It feels like – and is - the end of an era. I want to reflect right at the start that there seems to be almost unanimous regret across Clifton that this beloved institution is ending its occupation of the Garden site.

There are two main elements to the ‘loss’ of the zoo – one is the end of the zoo itself, with its magical offering, the nostalgia of childhood visits, the roar of lions over residential streets. The other is the future of the special open space in the heart of Clifton, along with its listed buildings, mature trees, and enchanting waterways<sup>1</sup>.

There are many hundreds of comments on the plans for the site, many of which pertain to aspects that are not material to planning consent, and many of which are opposed to the building of any residential property at all inside the walls of the Garden Site. Unlike many other objectors, I can see the need for, and value of, some residential development on this site. This is a very sizeable space, with protected trees and listed buildings in it – most of the former, and all of the latter will be retained. With a housing crisis of the size Bristol is facing, with a need for 3,376 dwellings per year in the city, it would be an irresponsible derogation of our obligations to those waiting for homes not to include some housing on a non-greenfield site this big. One valid complaint is that the housing is too high-end. The Society are providing 40 affordable housing units, but this is the regulatory minimum. It is disappointing that the Society have not opted to go further than this in making the housing offer accessible to a wider range of buyers, particularly since the 20% threshold is based in the assumption of a fast-track implementation of the work.

An immense amount of time, effort and expense has been put into the design of the site by the Society, and many changes were made to the plans in response to suggestions from the public. At this stage, my own objection is based on the ‘acceptability’ of a designation shift to residential for the **entire** site. Although some residential units are necessary on this site, a sense of proportion must be applied. In the current Bristol Local Plan, the site is subject to three different policy designations; 1) DS9, BSC19, Sites of Nature Conservation Interest; and 2) BCS22, DS 31 Local Historic Parks and Gardens and 3) Important Open Space, DCS9, DM17. A direct change of use direct from this three-part designation to residential status for the entirety of the 12 acre site is beyond what is reasonable for the city. This is especially true for a site in such a historic part of the city with such a significant cultural and amenity history.

I am asking for the development to combine provision of much-needed housing with a more nuanced and thoughtful transformation of the site. I believe much of the public outrage at the current plans for the site would be dispelled if the following issues could be addressed:

- 1) Guaranteed access for the public in perpetuity
- 2) A significantly stronger sense of community control and use of the site
- 3) Precedent-setting carbon-positive standards for construction

1) Access

I commend the Society's efforts in the Management Plan to ensure free-of-charge public access, for the first time in the site's history. It is absolutely vital to ensure enduring community use of the public elements of the site. The council officers' report states that this access in perpetuity is guaranteed by the Section 106 clauses that will condition the sale of the site. However, this access could be even more securely safeguarded by the creation of a right of way under the Countryside and Rights of Way Act 2000, which would bind any future owners of the site.

Access is currently proposed as day-time only. The plan, point 2.2 states *"The provision of public access can be achieved in a number of ways, including providing limited access, unlimited or a variation in between, and this is explored further in the following section."* The plan then goes on to lay out the merits of the part-time open option in some detail, but does not discuss what the possibilities would be around unlimited public access.

The Council officers' report recommends a condition of timed access, free of charge, to the public. I feel this is not enough, and I would like to see 24-hour open access to the public via the pedestrian entrances. There is no reason why the site should be closed at night to non-residents. In many other places in Clifton and the city, private residential buildings surround much-loved, much-used permanently-open public space such as squares, without any concerns about anti-social behaviour.

## 2) Community use

The plans indicate that the public use area of the site will go from 51% in its days as a zoo, to 56% under the terms of the new development. To make this public realm meaningful, stronger community ownership must be guaranteed. The Society should set up a Community Land Trust (or similar) to include the gardens and water bodies and much of the public space, so that (as per point 1) protections and public access could be written into the constitution. The Society could play a central role in this CLT, with its environmental and educational agenda via an expanded eco-hub as a core outcome of the community management, along with other community benefits such as art exhibitions, educational events, theatre.

Creation of a Community Land Trust would:

- end the widespread suspicion that after some time, the site will close to the public. It would provide a **guarantee** of public access in perpetuity (as per point 1 above) and remove all questions about the protections disappearing in a few years' time as developers change the conditions or sell the site onwards
- **ensure** the Society's plan to use that space for public events, art installations, concerts etc
- give the Avon Downs and Gorge Wildlife Project the chance to radically expand its work, and to be a convening point for the city's other environmental education projects
- be a vehicle for fund-raising to maintain the space, and would generate profile for the Society
- be an opportunity for the Society to have a living legacy in the form of unique community space that simply does not exist anywhere else in Clifton.

## 3) Environmentally-responsible construction

The current proposal includes the demolition of many buildings, including the relatively new Education Centre, and is arguably not consistent with the NPPF and policies BCS13, BCS14, and BCS15 of the city's Net Zero Strategy. The Society has the chance, with this development, to do something extraordinary for the city's commitment to the climate crisis. The Society is a big player in Bristol, and Bristol is a city leader in a country at the forefront of global environmental

commitments. This gives the Zoo direct line of sight to the world's struggle for net zero. The importance of the built environment in meeting global climate goals is now fully recognised. Bristol's ability to re-think the way we build is going to be critical in the city's realisation of its ambitions.

Recently in Oxfordshire, a residential development has won multiple awards for its climate positive homes, built to the highest standards of energy efficiency. This means the carbon footprint is better than zero; the houses sequester more carbon than they emit and generate more energy than they use. Other examples can readily be found in the UK and Europe of houses built largely with sustainable wood, which can be built off-site, meaning far less disruption for the neighbours and the schools nearby over the coming years, and a faster completion of the construction.

The Society should be asked by residents and the Council to ensure a construction method of this sort for the future residences on the site. This would be standard-setting for Bristol, a European Green capital city with a ground-breaking commitment to the climate and ecological emergencies, in the era of its new Local Plan. And it would allow the Zoological Society, a conservation and environment charity, to demonstrate global leadership in responsible construction and development as another element of its legacy to this special site.

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<sup>i i</sup> The relatively recent Save Bristol Zoo Garden Site (SBGZS) campaign is an attempt to address both these losses. The group are trying to expose mismanagement and bad faith in the operation of the Society in recent years that has led to their decision to close the Garden site. The group's approach is to campaign to force the Society to reverse its decision, and to re-open, as a means of keeping the space as something available to the public. Their report states: "We believe that there is a historic and moral obligation to... save the Zoological Society, the Zoo, the animals and the gardens and to make a success of both sites".

I am not part of the campaign for the following reasons:

- 1) It feels like a rear-guard action that could have more usefully supported the zoo to stay open two years ago when the intention to close was declared. At that point, there should have been public pressure for the Society to run a more radical consultation that asked people what they wanted the space to be, rather than asking them how they thought the residential plan could be improved
- 2) My own feelings, and Green Party policy, run against the incarceration of animals – urban zoos are an outdated form of entertainment. In current zoo commentary in the UK, the key justification underpinning their continuation is that they be linked to a strong agenda of conservation and education, and to research on critically endangered species. Simultaneously, stricter scrutiny is being applied to the conditions under which animals are being enclosed. This is precisely what the Bristol Zoological Society are responding to with their conservation strategy, and their shift to Wild Place.
- 3) Finally, and significantly, the SBZGS report's fundamental point, that the zoo has been mismanaged and did not have to close, is not material to the planning application in front of us. Other incipient visions for the site, however alluring, are also immaterial to this consideration.

## SCHOOL OF HUMANITIES

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Acting Head of School: Professor Leah Tether

25 April 2023

**To whom it may concern:**

I write in my capacity as Senior Lecturer in Modern and Environmental History at the University of Bristol in response to plans to grant planning permission for development at the site of the Bristol Zoological Gardens.

I am the author of *The Wild Within: Histories of a Landmark British Zoo* (2018), have published articles in popular and academic outlets on the subject of Bristol Zoo, and have appeared on television and radio – across documentaries and news – to speak about the Zoo's history and significance, and about zoos more generally.

I write primarily to sound a note of caution and to ask for assurances that all options have been *comprehensively and publicly considered* that will allow the Clifton site to remain open as a zoological garden (however conceived). The Zoo is a site of enormous heritage value, not least in terms of the deep history attached to the site itself. The fifth oldest zoo in the world, and the oldest surviving outside of a capital city, Bristol stands to lose out in significant ways if this is allowed to be diluted. The gardens themselves, containing trees of very significant age and heritage, and examples of Victorian architecture that are world-famous, are unique in many ways. They have an international profile that bolsters Bristol's global repute.

The value of the Zoo also lies in its position in relation to the very feeling of *being Bristolian*. Generation after generation have visited the Clifton site – often as children, parents, and then grandparents – and people have formed strong attachments to it that ought not to be taken lightly. My own research – undertaken for several years between 2010 and 2016 - really brought home to me the emotional attachments people from across generations and classes have had – and continue to have – with the zoo. I was continually astonished by the strength of feeling.

Of course, I recognise that the history of zoos is one of constant change. *Traditional* urban zoos have largely had their day, in my view, and I do not support the view that the zoo could simply continue as it was. But that does not mean that something exciting could not be envisaged in its place that actively preserves and deepens the heritage values articulated above.

Yours sincerely,



Dr Andrew Flack  
[Andrew.flack@bristol.ac.uk](mailto:Andrew.flack@bristol.ac.uk)

**Public Forum Statement: 22/02737/F and 22/02889/LA**

This application should be refused. The Officer's Report time and again refers to the fact that the scale and massing of what is proposed contravenes its policies and the National Planning Policy Framework. See pages 3, 56, 76, 77, 99, 103, 104, 136 and 138 where it is stated that unequivocally that **the development cannot be considered to be well designed**'.

Paragraph 134 of the National Planning Policy Framework dictates that **'Development that is not well designed should be refused.'**

Notwithstanding this, the report asserted that the scale and massing were justified on the principle that it was necessary for financial reasons to fund the upkeep of the gardens. It therefore recommended the application for approval subject to conditions and a section 106 agreement.

That recommendation was made after BCC accepted without demur or challenge or other evidence the assertion of BZS that *'based on the Society's experience of managing the existing site and the proposed development [sic] ... the open and publicly accessible spaces within the site will cost £200,000 per annum'* which BZS suggests *'to equate to £1,275 per unit per annum.'*

There was no reason for BCC to have meekly accepted without question the Zoo's self-serving contention that it would cost £200,000. And in any event this is an entirely improper matter to take into account. The figures which the Zoo quotes are predicated on the assumption that its commercial return should trump the provisions of the NPPF. Quite the contrary; the wording of the NPPF is clear; it imposes a statutory **obligation which has priority over all other considerations. If the development is not well designed (as the OR makes clear) the application must be refused.**

**Adam Chivers**





- stated repeatedly that the scale and massing of the proposed development was inappropriate and contrary to its own policies as well as the National Planning Policy framework – indeed concluded that **the development ‘cannot be considered to be well designed’** (page 138).

Notwithstanding this, the report asserted that the scale and massing were justified on the principle that it was necessary for financial reasons to fund the upkeep of the gardens. It therefore recommended the application for approval subject to conditions and a section 106 agreement.

The recommendation was made after BCC accepted without demur or challenge or other evidence the assertion of BZS that *‘based on the Society’s experience of managing the existing site and the proposed development [sic] ... the open and publicly accessible spaces within the site will cost £200,000 per annum’* which BZS suggests *‘to equate to £1,275 per unit per annum.’*

- stated that should members resolve to grant permission BCC would need to consult with the Secretary of State prior to making a decision to provide him with the opportunity to consider using his power to call in pursuant to Section 77.

A selection of the relevant passages in the report are contained in **Appendix 3**.

## The Committee meeting

1. The planning application is to be considered at a meeting of BCC Development Management meeting on 26 April 2023.

## The Caborn principles

2. Our application relies on three of the Caborn principles in support of the contention that it would be appropriate for the Secretary of State to use his power under section 77 of the Town and Country Planning Act 1990 to call in the planning application for determination. The first two principles identified below are closely aligned in this case and are therefore dealt with together.
3. **First, the circumstances are such that the determination of the application may conflict with national policies.**

**Second, the determination may raise significant architectural and urban design issues.**

4. It is submitted that the proposal is wholly inconsistent with the Government's laudable prioritisation of beauty as an overarching objective. The Officer's Report to Committee itself concedes that

**'the development cannot be considered to be well designed'** (page 138).

We are of course conscious of the contents of the letter to Council Leaders from the Secretary of State for Levelling Up, Housing and Communities dated 1 December 2022 and headed ***Creating Beautiful. Popular, Healthy and Sustainable Places*** which stated:

*The Government considers that beauty and good design are central to levelling up and good place-making. In July 2021, the National Planning Policy Framework established beauty as an overarching objective alongside sustainable development and stated that all development that is not well designed should be refused.'*

We are also aware of the Secretary of State's letter to MPs dated 5

December 2022 which, under the heading 'Character' stated

*'local authorities will not be expected to build developments at densities that would be wholly out of character with existing areas or which would lead to a significant change of character, for example, new blocks of high-rise flats which are entirely inappropriate in a low-rise neighbourhood.'*

It is submitted that the proposals that have been made for the main site are wholly inconsistent both with government policy and with the National Planning Policy Framework. That fact has been conceded in the Officer's report to Committee - yet a recommendation was still made for approval of the application.

It is further submitted that the principle on which the Officers Report relied in disregarding its conclusion that the development '**cannot be considered to be well designed**' (namely that the otherwise objectionable scale and massing are necessary to finance the maintenance of the gardens) is improper. Moreover, there was no reason for BCC to have meekly accepted without question the self-serving contention that it would cost £200,000 per annum to do so.

**Third, the determination could have significant effects beyond their immediate locality**

5. Documents made available by Bristol City Council following a Request for Further Information in relation to the grant of planning permission for the WCP have given cause for considerable concern bearing in mind the degree of independence that members of the public were (and are) entitled to expect from the local planning authority in dealing with that application, the application in relation to the main site and indeed with any other application.
6. The degree to which Bristol City Council compromised its independence in dealing with the WCP raises a concern for the determination of the application for the main site. It also has significant implications for the consideration of planning applications generally. The documents disclosed establish that prior to publication of the final version of its Case Officer's report to members on the WCP site Bristol City Council

(a) provided at least one (and probably three) of its draft report(s) to the

- BZS and its consultants for their '*comments*' and for a '*review*';
- (b) specifically solicited BZS's '***recommended amendments***' of such report(s) in advance of publication; and
- (c) shared with BZS confidential legal advice which it had obtained.

The correspondence in question is included at **Appendix 4**. It needs to be seen in context: on 13 September 2021 in a Zoom meeting with certain objectors the Case Officer dealing with the WCP application indicated, as a matter of apparently sufficient relevance to be worth mentioning, that that he and his Department were under significant pressure to approve the application.

7. It is submitted that there must in the circumstances be grounds for legitimate concern that the advice given to Members of the Committee on the main site has been compromised by a lack of independence. Furthermore, if this or any other planning authority is enabled to demonstrate a serious lack of independence and to do so with impunity, the integrity of planning procedures generally may be compromised. If public confidence in the process is to be secured, the matter should therefore be called in for determination.
8. For these reasons, it is submitted that it is appropriate for the Secretary of State to call in this application and in the meantime if necessary to exercise his powers under Article 31 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 to delay the grant of planning permission until he has decided whether to call in the application.

Adam Chivers for and on behalf of the Clifton and Hotwells Improvement Society  
Felixstowe Cottage  
Litfield Road  
Bristol BS8 3LL

Email address for all correspondence: **adam.chivers60@gmail.com**

## **Appendix 1**

### **The site**



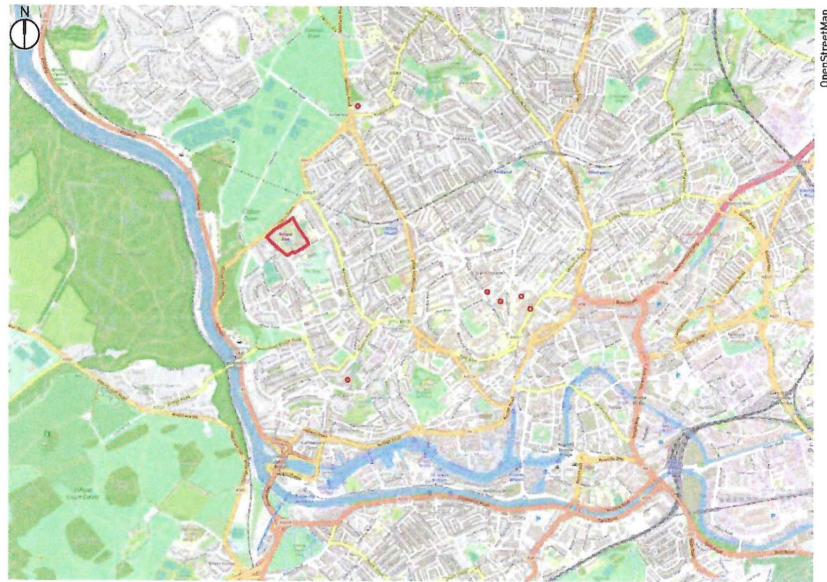


Fig. 1: Location map, showing the Bristol Zoo Gardens site outlined in red



Fig. 2: Aerial view of the site, with the site boundary outlined in red

## **Appendix 2**

### **Visualisations of the proposed development**



## 12.10

Scale visualisation of proposed Housing Development at Bristol Zoo Gdns  
Planning Ref 22/02737/F May 30<sup>th</sup> 2022



View from main Zoo entrance looking east along Clifton Down: monolithic 150 metres block of 4-6 storey flats up to 80 feet higher than existing wall.



View from east Zoo entrance/car park looking west along Clifton Down.

## 12.11

Scale visualisation of proposed Housing Development at Bristol Zoo Gdns  
Planning Ref 22/02737/F May 30<sup>th</sup> 2022



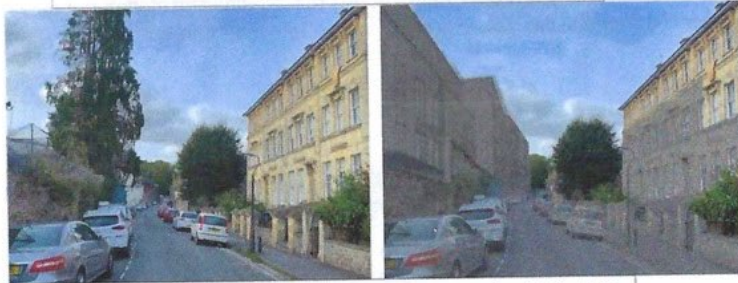
View of 6 storey block of flats from Northcote Rd next to children's playground.



Views West along Guthrie Rd show c. 100 metres of block of flats obscuring trees and sky – note scale of man against corner wall.

12.12

Scale visualisation of proposed Housing Development at Bristol Zoo Gdns  
Planning Ref 22/02737/F May 30<sup>th</sup> 2022



View from Northcote Rd terrace looking North to Downs – note enclosing canyon and overshadowing effects



View from Clifton Down looking South down Northcote Rd – over 150 metres of 4-6 storey blocks of flats

12.13



### **Appendix 3**

#### **Extracts from the Officer's Report**

- the proposal is not in accordance with the development plan (page 3)
- the residential proposals are contrary to [BCC] policies (page 56)
- The site is of considerable heritage significance and contributes positively to the significance of the Clifton and Hotwells Conservation Area. (page 71)
- if planning permission is granted, it will change the use of the site, which would represent a harmful impact to the significance of the site. (page 75)
- officers agree with the comments of many statutory consultees in their criticism of the scale, height, and massing of the perimeter buildings due to its impact on the setting of the Conservation Area (pages 76 and 77)
- Officers have identified the proposal's harmful impact on heritage assets, which is largely due to the quantum of residential development. The Applicant states... that the quantum of development is necessary to enable sufficient recurring income to fund the management and maintenance of the publicly accessible gardens and spaces, and to sustain the heritage assets (including the historic gardens) in the long term. In this way the quantum of units is critical to the viability of managing the open spaces (and landscape) within the site at no financial cost to the public (page 83)
- there is clear and convincing justification for the harm the residential development will introduce, namely that the quantum of development is required to facilitate the heritage gains and public benefits of the scheme. The scale and massing of the development is driven by the quantum of development, which is justified. (page 84)

- Section 12 of the NPPF highlights the importance of good design, advising it is a key aspect of sustainable development (paragraph 126), and directing development that is not well-designed to be refused (paragraph 134) (page 97)
- officers agree with concerns over [the] height, scale and mass [of the perimeter blocks] (page 99)
- The ... scale and massing that does not respond well to the local context. The application is therefore inconsistent with [BCC] policy (page 103)
- ... the proposal's design is contrary to [BCC] policies ... due to its scale and massing failing to be appropriately informed by the local context. (page 104)
- the proposal's design is contrary to [BCC] policies ...due to its scale and massing failing to be appropriately informed by the local context (page 136)
- A thorough review of the development plans policies relevant to this application indicates that the application is not in accordance with the development plan when taken as a whole as it conflicts with multiple policies ... including some of those that are most important to the determination of this application, (page 136)
- Whilst many aspects of the proposal's design conform to the expectations of the NPPF ... the proposal's scale and mass fail to suitably respond to the area's prevailing character, meaning the proposal does not comply with all of the NPPF's expectations, including paragraphs 124d and 130c. (page 136)

- The ... proposal's scale and massing means that on balance, the development cannot be considered to be 'well designed' in the context of paragraph 134, which suggests the development should be refused. (page 138)
- the proposal is not in accordance with [BCC's] Development plan (page 139)

## **Appendix 4**

### **Correspondence between BCC and BZS**

- **On 7 July 2022 Peter Westbury (the Case Officer at BCC) emailed Harry Quartermain (of BZS' planning consultants) to state:**

*'I have attached a latest draft of the Report for Committee ahead of the Meeting on the 24<sup>th</sup> August. Our Barrister has not yet reviewed this but we wanted to give you the heads up on this now.*

*I would be grateful for your team's comments and recommended amendments.'*

- **On 14 July 2022 Francesca Fryer of BZS emailed the Case Officers at BCC to state:**

*'Thank you for sharing the draft report. Harry [Quartermain] will send Peter [Westbury] our comments by early next week; I haven't passed it to our lawyers yet, as it might be better to engage them once we have the updated version.'*

- **On 21 October 2022 Francesca Fryer of BZS emailed to the Case Officers at BCC to state:**

*'Harry has shared your draft report and timetable for finalisation with us – thank you. We will review and respond as you have suggested.'*

- **On 7 November 2022 (two days before the due date for publication of the Officer's Report) Francesca Fryer of BZS emailed the Case Officer at BCC under a heading 'Committee Report' to state**

*'Thank you for all your work on this. I will read through the final version this evening.*

*Fully appreciate there isn't time to meet tomorrow – so in the unlikely event I have any final comments or questions I will send them directly to you.*

*Do you intend to publish the report on Wednesday?'*

- **On 2 August 2022 Peter Westbury emailed Francesca Fryer to state:**



*'I have received the following confidential advice on my report this morning...'*

In responding to the Request for Information BCC redacted the advice.

Dear Committee

Below is our statement on behalf of the Northcote Rd residents. We feel the scheme is overbearing and the damage to our amenity is understated and valued. We believe the insistence that the Zoo needs every single flat to raise £200,000 per year maintenance and, therefore, build a clashing design at unacceptable scale in a conservation is flawed and should be challenged. As well as the impact on our most immediate environment it will spoil the area in which we walk and live.

Please see our statement below.

Best regards

John Hatton

One minute statement from John Hatton a Neighbouring Resident on Behalf of the Northcote Rd Residents Association

"I am John Hatton, a retired teacher and have lived in my flat and worked in Northcote Rd for 21 years. I am speaking on behalf of the Northcote Rd Residents' Association. We are 40 people living in 14 residences/mostly flats in a Victorian terrace, less than 15 metres across from the zoo. We were shocked when the zoo closed but mostly we are angry and devastated by the apparent indifference of the Zoo. As its closest neighbours we are acknowledged as the people most affected by the loss of light, outlook and amenity. We expected to lose our views but not to be denied all sight of sky from our main living spaces. Not just to be looking at a massive brick wall just over 60 feet away - nearer than the end of this room. When this was pointed out we were told "you'll just have to close your curtains...."

We are not asking for views - just access to the basic amenity of sky. The adjustments made to the proposal still do not deliver this for us all.

These blocks are just a few metres away and will rise way above our windows, intrude into our living rooms and darken and dominate our street, greatly diminishing our lives. Much of this impact and our distress could be reduced - simply by removing just two or three flats from the scheme and lowering the height in the right places. Yet it is implied this would make the entire scheme unviable - presumably because of losing £3-£4,000 per year in maintenance charges. This makes no sense - it all seems ridiculous, cruel and unnecessary. Just wrong.

Nowhere in Clifton is this large and this close - directly opposite a residential building. The design is completely out of character, unsympathetic and unneighbourly, in clear breach of Bristol and National policies for better design. Please, say no and ask for better."

**Public Forum Statement: Application no's. 1. 22/02737/F & 2. 22/02889/LA**

The basis for the recommendation to grant this application rests on the officer's view of the balance between the supposedly 'less than substantial' harm to which the development gives rise, and the supposed public benefits, some of which are not public, but the main one of which appears to be, in the eyes of the officer, the securing of public access to the gardens.

It is somewhat ridiculous to see – in the officer report – a discussion about the need for a specific scale of development – which is what gives rise to the harm – as being necessary to generate a sum of revenue that secures the public benefit. The applicant has invited the officers to take their view that the only way to fund the future of the gardens is through annual service charges, and that because there might be some upper ceiling on such charges, then there must be a minimum number of units built to fund the gardens. The officer report suggests the Council has swallowed this line without considering alternative funding models.

I've read the majority of the documents that the applicant has produced. I can't promise that I've read them all, but it would be helpful if the applicant had been honest with us as from the start. I am not sure that I recall a discussion where the applicant stated, clearly and openly, in consultation that "we can't build less than 196 houses because we need to fund the gardens", or "we have to build at least 196 houses as we need to secure enough revenue from service charges to fund the upkeep and maintenance of the public spaces." I wonder also whether that has been offered as the central basis for designing the development as it has been designed. I don't recall such honesty in the public consultation. I don't recall anyone saying "we're sorry that this is so big but we have to secure the money to ensure public access to the gardens is secured".

This is, of course, ridiculous. We are being asked to accept that we cannot have the gardens without the proposed quantum of development. That is simply untrue. I've asked a number of people involved in ensuring annual revenue payments are available to fund an ongoing obligation. There is basically one answer that comes back: put the money in an ESCROW account. If the Council officers had considered this route, presumably, we could have secured the access to the site without the requirement for the scale of the development. We would have all the benefit and less of the harm. All that would be required is that the residual land value would need to exceed the sum required to secure the future of the gardens.

This also highlights the tension that has existed between the applicant, and the officers and members of this Committee. It is not the job of the planning system to maximize the value of land for a landowner. In many respects, the opposite is (or should be) the case: to the extent that affordable housing is maximized subject to viability, residual land values are suppressed. In this case, the Zoo has a clear interest in maximizing the value of the land. It is not the job of the officers, or the Committee, to roll over and allow inappropriate development simply to help the Zoo maximize the capital receipt from sale of land.

The NPPF is clear at para 134: where development is poorly designed, it should be rejected. This development has – according to this report - been designed on a scale that causes harm so that it can generate revenue to secure a public benefit. Since that public benefit could have been secured through a payment of a capital sum into an ESCROW account, the quantum of development can be considered unnecessarily harmful, and it follows that the development has been poorly designed. Accordingly, it should be refused.

There are numerous other grounds for refusal, both in relation to policies in the core strategy and the NPPF requirements in respect of design (which are interpreted as being narrower in scope in the officer report than the NPPF now requires). Officers have made decisions to allow the applicant an easy ride through to compliance in respect of BCS14 (by allowing the applicant to assume that the carbon intensity of grid electricity is as it last was a decade ago, and by suggesting that “heat pumps are considered a renewable technology”), and they have overlooked the requirement to minimize embodied carbon as part and parcel of ‘good design’ under the NPPF. There may not be targets in place for this, but if you were asked to ‘minimize’ the energy use of a fridge, you wouldn’t choose one with energy efficiency rating E: suggestions that this can be dealt with after design and planning are not consistent with their inclusion as matters of design under the NPPF, against which an application could be rejected.

The applicant’s proposal fails on this, and on many other design characteristics. For a Council that has declared a climate emergency, however, this looks like a ridiculous oversight. The upfront construction emissions from this proposal will be around 255 times the annual emissions from operation.

I ask Councillors on the Committee to take a decision on lawful grounds, and accordingly, to refuse the application on grounds of the serious flaws in its design.

**Public Forum Statement: Application no's. 1. 22/02737/F & 2. 22/02889/LA**

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I ask Councillors on the Committee to take a decision on lawful grounds, and accordingly, to refuse the application on grounds of the serious flaws in its design.

I have lived in Bristol for nearly 50 years. I feel I am about to witness the creation of a new planning monstrosity built upon sand. We are told that the gardens will remain open and that 20% of the housing will be affordable. If you genuinely believe these things, then go ahead – but be certain that you are right.

Right of access to the gardens CANNOT be guaranteed long term; the gardens are highly likely to be gated and privatized within the next five years let alone the next 185.

Note that a public space was not in the Zoo's original scheme. At the Society's AGM, the Zoo's CEO proposed that 'the gardens themselves would remain largely unchanged and ....would not be publicly accessible owing to the need to optimise the site value.'

The gardens need to be owned by a separate body. The Councillors for Clifton ward have already called for such a solution, a trust to safeguard access to the public for ever.

Calls have been made to make the Zoological Gardens a registered Park and Garden or to find other protection such as Right of Way or Open Space, but at present no such protection is in place. The s106 protection proposed is weak and can be unravelled after only five years by agreement with the Zoo. It will have other concerns in 50 years.

There is no guarantee that the new owners of the site will build it this way at all. As soon as it is theirs, they can rip up the plans and propose an entirely different scheme. Or, like the WH Smith site in Clifton, leave it empty and rotting for years.

Insufficient time has been allowed to explore alternatives - either by the Zoo or by other potentially interested parties - which would benefit Bristol city and its people much more widely.

BY REJECTING THIS APPLICATION YOU CAN BUY THE TIME NEEDED BY THE ZOO AND THE WIDER CITY TO EXPLORE ALTERNATIVE PLANS.

Any sense of urgency over this decision is dwarfed by the need to look ahead for another 186 years. Perhaps one or two of them could be set aside to work out a better future for this nationally important site.

**Clifton College Written Statement to Development Control Committee A, 26<sup>th</sup> April 2023**  
**Reference: 22/02737/F | Bristol Zoo Gardens, Guthrie Road, Bristol, BS8 3HA**

As long-standing members and neighbours of Bristol Zoological Society (“BZS”), Clifton College is supportive of the BZS in securing its future for the continued conservation of its animals and support the vital education they provide for the wider community. Clifton College acknowledges that the Bristol Zoo Gardens (“BZG”) site will need to be developed however, as an operational school with overall responsibility for the safeguarding and wellbeing of all its pupils and as guardians of a large number of statutorily and locally listed heritage assets, the revised proposals at the site continue to raise a number of significant concerns for the College. It is on this basis that the College uphold their objection to the proposals in their current format.

The College acknowledges the changes and further information provided by the Applicant to address concerns about the overlooking of school buildings. However, the College still maintain their concerns around the proximity and scale of the development proposals to several school buildings, including statutorily and locally listed heritage assets, along Northcote Road and Guthrie Road, noting that these school buildings include not only teaching provision but boarding accommodation also. Boarding accommodation at its heart is overnight accommodation for children concentrated in one building, which is particularly sensitive to overlooking. The College have a statutory duty of care to ensure the ongoing protection and privacy of children, in what are their bedrooms and living spaces. The Daylight and Sunlight Report included as part of the application proposals evidences that there is the potential for medium to high reduction in daylight levels across a number of the College’s buildings. With proposed impacts on daylight into rooms that are used throughout the day as boarding and pastoral spaces, which are particularly sensitive to a reduction in daylight and the subsequent detrimental impact on pupil and staff wellbeing this will provide.

Further to previous objections and additional technical due diligence undertaken on the College’s behalf by Highgate Transportation, the College uphold their concerns around the proposed changes to the vehicular access to the BZG site. Noting that, as demonstrated in the additional due diligence prepared, the concentration of vehicle movements on roads adjacent to the College will increase as a direct result of these proposals, this increase will be particularly apparent at Guthrie Road and Northcote Road. The College’s primary concern in relation to vehicular traffic movements relates to the potential impacts this poses as a highway safety issue for school children, either as they are being dropped off or collected at school or throughout the day as they move between buildings for lessons. These concerns are not only limited to the development once built, but also during the construction phases of the development, where the impact of construction noise, dust and construction traffic movements, has the potential to have a significant detrimental impact on the wellbeing and academic attainment of school children at the College, with the potential of construction to negatively impact on examinations, pupil learning and pupil movements.

As a result of the above the College consider that in their current form, the proposals are not appropriate to the BZG site and uphold their objection to the scheme and recommend that in the interests of child safety and heritage the proposals in their current form be refused.



**Chair and Councillors:**

My name is Carrie Sage. I am a Bristol resident and a charity CEO, experienced in supporting Boards of Trustees through challenges and in mentoring senior charity personnel.

My concern is whether the decision to sell the Zoo Gardens site, and the process surrounding the decision to sell and to apply for planning permission, was lawful, open and appropriate, particularly for a heritage asset of such significance.

Bristol Zoological Society's charitable objects concern conservation, nothing else. The duty of the Trustees is to further these objects. Their aim cannot be (as is often asserted by the CEO and implied in the Planning Officer's Report) to maximise the sale value of the Zoo site through housing development - even if this is to fund ambitions at Wild Place. This is unlawful.

It also appears that the Zoo has not adequately fulfilled its responsibilities to consider alternatives to the sale and to consult on them. Members will be aware that all trustees bear significant fiduciary responsibilities in respect of decision making and accountability – especially to any shareholders, as is the case with Bristol Zoological Society.

The Planning Officer's report states that 'Officers acknowledge there may well have been other options than closure of the Zoo'. The Conservation Advisory Panel, in its objection, also reminds us that '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'.

Neither different scenarios, nor other options, nor a business case of any kind have been disclosed by the Zoo – not in public, and not even to its own shareholders at the AGM on 27.11.20 or at the EGM on 18.12.20. This is not a case of a private property development company making a commercial decision. It is a prominent conservation charity that must carry out its purposes for the public benefit and be accountable to the public. Why the secrecy?

No-one would I think believe that London Zoo would suddenly change its strategy, decide to sell and then go for planning to build houses without any kind of open consultation on alternatives. There would be uproar. Why is Bristol Zoo any different?

I respectfully suggest to Members that the failure by the Zoo Board to be mindful of its lawful objects as a charity, to discuss options openly and to engage honestly and constructively about the decision process which led to the application before you is a gaping omission that undermines – and should defeat - this entire planning process.

We look to our elected representatives to ensure that the context as well as the substance of matters put before them have equal weight. You have received enormous amounts of information on the second but the first is just as vital for Members to judge fairly.

The responsible decision must be to reject any decision on this application until a proper examination of the Zoo's operational objectives and business plan - and a fair public consultation - has taken place. In the context of 186 years of Bristol Zoological Gardens a few months of thorough

consideration is nothing. But it could be everything to the people of Bristol, and to our children and grandchildren.

Please reject this application. Thank you.

**Written Submission by Tom Jones – Bristol Zoo Planning Application -  
Challenging The Applicant's Viability And Change Of Use Argument**

Bristol Zoo did not need to close.

After 186 years, two World Wars and 90 million visitors, a tiny minority of people with extraordinarily limited Zoological experience, took a highly subjective decision during a global pandemic. No reassessment has happened, no business case has been presented, no alternative options have been debated. The Zoo Board remains doggedly attached to a self-destructive strategy which could see Bristol without BOTH the Zoological gardens AND Wild Place Project.

Everything Bristol Zoological Society's management have stated publicly about their reasons for closing has been, at best, highly misleading. BZS have also continuously described Bristol Zoo as *"not fit for purpose."* In doing so, they have misled their Shareholders, the media and the public. Here are some facts behind the spin:

- In its 'Strategy To 2025,' published in Summer 2019, BZS said, *"Across our two sites we remain one of the most popular Zoos in the UK" and "At both Bristol Zoo Gardens and Wild Place, we are the fortunate custodians of much valued built assets and historic landscapes, full of rich diversity that we must continue to cherish. We maintain many different habitats that hold great amenity value across both our zoos, which we must protect for our visitors and future generations as the world develops around us."*
- In their 2019 published accounts, BZS described themselves as having *"an increase in profitability of £2.5m due to "increases in visitor income, decreases in costs and gains on investments, investment properties and the actuarial pension scheme."*
- Bristol Zoo's attendance figures for every year since the Wild Place opened have been substantially higher than the Wild Place and even in 2019, an exceptional year for WP when Bear Wood opened, Bristol Zoo's attendance figures were still 200,000 higher than the Wild Place.
- In 2019, membership income for Bristol Zoo was almost 4 times higher than for the Wild Place.
- For Bristol Zoo Gardens, overall visitor numbers have been very stable from 2005 through to 2020 when the pandemic hit, always between 500,000 – 600,000 annually.
- Broadly speaking, overall attendance figures for BZS have been increasing year on year since 2013.
- 35,000 schoolchildren visited Bristol Zoo Gardens in 2019 vs 6,000 at the Wild Place.

Your Planning Officer's report asserts that no alternative plans exist. This is incorrect and has misled you. Pre-application advice was sought from the Council by both the Our World Project and Clifton College. The Zoo has stonewalled both propositions and refused to examine them.

BZS Shareholders were told that voting for sale of BZG was the *only* viable option for the Society. Untrue. KPMG presented **eight** options to Trustees, only **one** of which was the sale of Bristol Zoo Gardens. This report is still being withheld from Shareholders. The Zoo has misled its Shareholders.

The reason for the sale of Bristol Zoo Gardens is to fund the Wild Place Project. Funding an attraction in South Gloucestershire is not a reason to grant planning permission to build housing on this historic Bristol site. The Zoo claimed better homes for the animals and (through its desperate recent re-branding) and a better project on which to focus conservation efforts. Also untrue. Only between 15 and 20 acres at Wild Place remain capable of development, with only two mammal species making the trip to South Gloucestershire. There is no evidence to suggest Wild Place will attract more visitors than BZS already was across its two sites. It has no planning permission, and no funding for the estimated £200m it needs at the Wild Place. Receipts from selling the Gardens site will not come close to filling this black hole. We have been misled by the Zoo.

By granting planning permission today, you will be sanctioning the destruction of history. Almost half of the trees on this nationally important, horticultural site will go. The iconic herbaceous border where for generations, families have scattered loved one's ashes will be bulldozed. Once it has gone, it has gone forever and is not coming back. How will history judge that decision for Bristol?

You can and you *must*, say no. Direct Bristol Zoological Society to think again. This proposal only works for a myopic BZS management and profit-seeking housing developers. It does not work for the people for Bristol, neither now nor for the future.

Please make a decision that is both lawful and moral. Reject this proposal. Thank you.

Dear committee members

The idea behind the free public open access is a really nice idea but in actual reality, unfortunately the scale of the redevelopment, its environmental damage and impact and effects on the conservation are simply too damaging with this particular design. Their professionally provided visualisations have been way too selective, glossy and fantastical and completely under-representative, not to say misleading of the most likely actual experience.

The benefits to local people compared with harm on the environment, (natural, historical and cultural) are not balanced in favour of this scheme. The most likely reality is an uncomfortable co-existence between the public and private residents. It may not even be possible for this private residential relationship to ever to work long term. The current scale of the development makes it even less unlikely. It will feel - and despite best efforts - may in the end just become - an expensive private housing development: mostly gated as it understandably needs to be. The Zoo seems stuck on saying this quantum/scale is required to support a £200,000 per year management charge. This is limited thinking and not the only option – just their preferred option to justify the scale and maximise profits.

The proposal contorts and breaching various national and local policy laws and should be refused on this basis alone. It is highly vulnerable to legal challenge and will be seen as insensitive and out of tune. Once built, people will see that and that would be a sad legacy for hundreds of years.

By refusing this you support the Zoo in encouraging better alternatives which do exist but have been, in effect been quashed and ignored by the Zoo's process under advisement, of pursuing maximising profit – we would say at the expense of the people of Bristol.

Best regards

Andrew Paten

**Challenging the Weight of Benefits given to the Public Open Space: One Minute Statement by Andrew Paten, Local resident**

“Whilst commendable in concept, the public benefits of such a materially altered open space with limited free access are seriously outweighed by the harms caused by the poor design and overwhelming scale of this unsympathetic development.

Dozens of mature trees will be lost, the “open” space will be dominated by hundreds of metres of flats three times higher than this chamber overlooking from their balconies just metres away, as close as many of you here - while the delivery vans make dozens of deliveries. The views beyond, of the old buildings and trees and skies will mostly be obliterated. The height, scale and mass of the development will deliver a greater feeling of enclosure to a private space rather than a public open space.

A **miniscule** number of local people believe the benefits will outweigh the harms. People further away will gain no public benefit – they may just feel that their memories have been desecrated as the historic gardens is turned into an expensive, landscaped housing estate for the few well off. This is at the clear expense of the natural, historical and cultural environments we all benefit from.

Please make the Zoo reconsider this poorly conceived design by saying no – and do not support the contorting or breaking many of Bristol's existing planning policies, which this current proposal clearly does.”

### **Affordable Housing One Minute Statement**

“Bristol defines affordable housing as homes to rent or buy that are put in reach of people not able to access market housing.

An “affordable 20% discounted one bedroom flat in this development is likely to cost £250,000 . With only 40, mostly one-bedroom units the council admits the number and profile is not ideal.

It is a minimal, token gesture, just to build an expensive housing estate that only the top 5% can afford. But it will require the loss of dozens of mature trees damaging the gardens, environment and conservation area. This is not a public benefit.

Bristol has recently stated that it has a record level of planning applications sufficient to deliver its housing for the next 5 years. The biggest challenge is a shortage of labour. Perversely this development would make things worse, diverting people from building affordable homes.

How is approving and building expensive housing that is so environmentally destructive on this precious site going to chime with the public in the middle of this climate crisis - in these times?”

Development Control Committee A – 26 April 2023

Application No. 22/02737/F : Bristol Zoo Gardens Guthrie Road Bristol BS8 3HA

### Objections from **Douglas Allan**

I write from the point of view of a wildlife documentary cameraman. I've lived in Bristol and worked for the BBC NHU and others since 1987. My family and I were members of the zoo for many years when my son was young. I myself gave several presentations at the Zoo's educational centre.

The Development Committee are to be praised for the fullness of the application report. 144 pages covering the many practical and financial issues over the future of the Zoo. About 125 of them very distinctly disapproving of the flat building proposal under consideration.

While I have many fond memories of the Zoo, I'm aware that in some areas of finance, changes were needed for its continued existence. A new location like *Wild Place* perhaps, But how much better it would be to embrace an imaginative, inspiring concept for the original site – like the “electronic” zoo for example, with a clustering of small local ventures with the focus on wildlife and conservation. A new direction for the Zoo that would make Bristol proud.

Bristol Zoo's heritage and the people of Bristol deserve better than this unsympathetic building project, out of scale and proportion with the surrounding dwellings. A development that will mean the loss of valuable communal and green space, as well as a place of education. The proposed gardens will not be of the same public interest when compared to the existing site.

The Zoo is of national significance, the community of Bristol should be afforded time to determine its future in the public interest. A sympathetic awareness of the natural world and our place within it is more important than ever, and Bristol Zoo and its gardens can play a crucial role in our progress towards Net Zero by 2050.

## **FAO Democratic Services**

Please see below our public statement for the above meeting on 26th April 2023 to be considered by the above committee.

Regards

IAN BECKEY Living Easton Heritage and Environmental Group

### **Public statement by Living Easton Heritage and Environmental Group on planning application 22/02737/F regarding the former Bristol zoo site**

Living Easton Heritage and Environmental Group are a community based environmental and heritage organisation of around 20 individuals and affiliated societies based predominantly around the suburbs of Easton, Whitehall, Barton Hill and Lawrence Hill in Bristol who take a particular interest in heritage, planning and sustainability issues in East Bristol.

Whilst we understand that there might be some valid reasons for the closure of Bristol Zoo on the Clifton Down site and the movement to the Wild Place Bristol Zoo vision project to allow for better animal care and welfare. We object to the loss of the Clifton zoo site and believe that it should remain as a zoo in some form or other as we know that it is a much valued community resource for the people of Bristol as well as tourists.

We welcome the retention of the gardens as a public open space for residents and tourists and the listed buildings but not necessarily the housing provision.

We are concerned about the lack of certain facilities within the zoo gardens which are likely to attract visitors being close to the Downs due to a lack of public toilets or cafe. As people will visit the gardens the paths must be fully accessible for wheelchair users and people with reduced mobility and families with buggies.

Whilst there is a major need for more housing within the Bristol city Region (especially affordable housing) with the 196 new homes proposed in the scheme and the provision of affordable housing and the 20% provision of housing to rent of m43 and m42 standards might be welcome, it appears that but fully accessible disabled housing is small in numbers. Whilst we appreciate that Clifton and Bristol West require does need affordable social housing so people can remain in the Clifton area and the provision of 50 homes being built as wheelchair accessible, we would prefer it to be built elsewhere as we don't want to see the loss of this important community facility as a zoo.

We do feel the housing and flat design is of a poor design in the Clifton conservation area. It would have been better see buildings and architecture in keeping with the Georgian and Victorian buildings around Clifton.

On transport we welcome the green travel plan but there appears to be a view that the bus services are all commercially viable including service 8 Bristol Temple Meads station, Broadmead shopping centre, city centre, Park Street and Clifton village. However, there is no bus service from Long Ashton Park and Ride to Clifton village, Clifton Downs and Southmead hospital bus station. There is a need for a West of England Mayoral Combined Transport Authority bus service supported by



Mayor Dan Norris funded by the Bristol City Council. but it appears that no for Section 106 funding contribution from the developer has been asked for towards bus services at a time when the City Region bus network is being cut by 33 bus services.

A green travel plan needs to be negotiated with the Zoological society as a matter of urgency. No provision appears to be made to provide a bus link from Bristol city centre, Clifton Down station, the Downs, Bristol Zoo site, Westbury-on-Trym, Henbury, Blaise Castle estate, Henbury station Metro West, Cribbs Causeway bus station and Wild Place Bristol zoo project .

Cycling and walking provision is welcomed but we share the concerns of Clifton College about the movement of vehicles in college Road, Guthrie Road and the coach and bus access for the college students. There is also a need for safe crossing points.

We support the Asset of Community Value application for the Bristol Zoo site which we would like to see reopened as a zoo in some form but also welcome the new Wild Place zoo project in North Bristol because of the facilities it will provide for larger zoo animals. Both of these zoos could further contribute towards wildlife conservation efforts in future.

We welcome the zoo garden public access for local residents and tourists to the Downs and the retention of listed buildings as part of the housing development. However, there are still potential opportunities for a reopened Bristol Zoo on the Clifton site which should be taken into consideration especially with an ACV application from the community still in progress.

Ian Beckey on behalf of Living Easton Heritage and Environmental Group

Dear Sir /Madame

Please except my expression of feelings regarding the Bristol Zoo Business and land development proposals.

*My name is Julie Liponoga, from Knowle. I have lived in Bristol most of my life. I took my children to the Zoo but won't make the journey once it has left the city. That's a shame, and all my friends will be in the same position. It's a big change and I can't see the need for it.*

*I can't understand why it has closed, as it seemed to be as popular as ever. Surely it would have got back on its feet after Covid, like other Zoos and other famous places, like the SS Great Britain. When was I consulted about it? I don't feel asked. Bristolians have supported this place for nearly 200 years and a tiny bunch of white and middle-class people now take it away from us.*

*Older friends have told me how the planners once nearly let the harbour get filled in for a giant road through the middle of Bristol. They have told me that I should stand up for what I love about this city. So here I am.*

*Anyway, the stuff they plan to put in its place is ugly, not what I like about Clifton. From the pictures I have seen it looks like a gentlemen's prison block, with nice private gardens for the prisoners. But it is such a shame to spoil a beautiful area like Clifton; I don't know how you can even be thinking about it.*

*That place belongs to us all and neither you nor the Zoo has the right to take it away from us.*

*Regards*

*Julie Liponoga*

## NP Written Statement – Bristol Zoo Gardens 22/02737/F

I am a local resident of 21 years with a keen interest in creating well-designed places. There are countless places in Bristol that have been saved and re-imagined from the threat of housing, bringing significant investment and cultural revival to Bristol - Clifton Lido and the Everyman Cinema being just two recent examples. Culture, Design, Heritage – these make or break a City.

Housing will destroy the intrinsic value and the wider public benefit of the enclosed gardens.

Michael Gove MP, Secretary of State, urged BCC (letter to Leader, dated 14<sup>th</sup> December 2022) to refuse development that is not well-designed and to not use housing supply as justification.

**“I urge you to act with confidence in accordance with the National Planning Policy Framework.**

**Developments that are not well-designed should be refused planning permission and housing targets should not be used as a justification to grant them,”** (Secretary of State, 14/12/2022, 1<sup>st</sup> bullet point).

The Planning Officer’s Report confirms that the scheme is “not well-designed” and conflicts with National and Local Planning Policy on design and heritage but justifies policy conflict on the premise of housing supply and public benefit for day-time use of the gardens.

Can you see the irony?

Officers say that high density housing will bring public benefit in maintaining the gardens and heritage [that will be radically altered by the scheme]. High density housing will destroy the character and intrinsic value of the Gardens and radically change the setting of listed buildings. The scheme flouts National and Local planning policy. **There is no public benefit in bad design.**

The Secretary of State made clear that housing targets (ie 5 year housing supply) cannot be used as justification for granting permission.

It is plain wrong to use an estimated £200k annual maintenance cost as justification for the scheme. It’s in the owner’s gift to reduce the liability to zero by investing proceeds from a sale or find another use. Public benefit should be ring-fenced in a Community Interest Company with external Community directors.

In this scheme, there will be minimal public benefit as benefits will be destroyed by design and housing use. I understand the Applicant has considered several viable alternatives. Housing is not the only option. 5 year housing supply cannot be used as justification.

**“Developments that are not well-designed should be refused planning permission and housing targets should not be used as a justification to grant them,”** (Secretary of State, Michael Gove MP).

I urge this Council to refuse planning permission.

There is no doubt that the closure of Bristol Zoo Gardens would be absolutely wrong. It is an irreplaceable national treasure and a safe, green space for the people of Bristol and beyond to learn about wildlife and animals and enjoy the outdoors.

As a Bristol GP and mother of three Bristol Zoo Gardens lovers, I have multiple concerns regarding this proposal. It is a proposal that will be detrimental to both the health and happiness of the people of Bristol. This is what matters. Bristol Zoo Gardens has contributed generously to our health and happiness for 186 years. In just the 5 years that I have been a member, my family and SO many others have spent countless days exploring every corner of the unique and beautiful gardens, children running freely and safely through the greens and fantastic play areas, learning so much about wildlife and teaching them the importance of conservation and caring for animals. I have seen my childrens' love, enthusiasm and feeling of responsibility for the animal kingdom grow with each visit, something I hope will be a lifelong passion.

For 186 years these incredible gardens and mature trees have been providing Bristolians with a very special sanctuary as well as purifying our air, an important job given that there are 28,000-36,000 deaths in the UK every year due to human made air pollution. It is disgraceful that we are actually considering replacing our incredible Bristol Zoo Gardens with six storey apartment blocks and houses, connected with roads and car parking... Is this the precedent that we want to set to our children and future generations of Bristolians? What green space will be next to go?

Bristol Zoo Gardens is irreplaceable. It provided a very accessible, unique, interesting and beautiful experience. I, and so many others based in Bristol will not be renewing our memberships for The Wild Place. It is inconvenient to get to and will never provide the same magic as Bristol Zoo Gardens.

I urge you to reject this proposal and make a lawful decision. Choose health and happiness for Bristol.

## Statement re. 22-02737-F Bristol Zoo Gardens

I wish to express my views on the Planning Application as a Bristol Zoological Society (BZS) shareholder who has valued the Zoo greatly over many years, but also is supportive of the development of Wild Place. For me and my family the Bristol Zoo has been a place where we have engaged close-up with the animals, surrounded by the beautiful gardens, in a unique urban setting. In recent years we have benefited from the increasing emphasis on the educational provisions. When the BZS published its 2020-2025 strategy stating it was to continue both the development of Wild Place and appropriate use of the Clifton site, I was fully in favour.

It was not until I read the Save Bristol Zoo Gardens full report that I realised that the economic case put to the shareholders for closing the Zoo was not as straight forward as the management and trustees had presented, and sale of the site was not a foregone conclusion.

In mid-February this year I learned that the management had commissioned a strategic report from KPMG, and selling the Clifton site was only one of several options for the way forward. This was surprising to me because on 7<sup>th</sup> February at a Neighbourhood Forum two senior individuals from BZS made a presentation about the future of the Zoo and gave no indication there was any alternative to selling the Clifton site. At a meeting convened by BZS for shareholders on 21<sup>st</sup> February I asked for details of all the other options proposed by KPMG and the reasoning behind the decision that was made but was told those details could not be disclosed. Regrettably that secrecy has been maintained.

The plans submitted will result in the replacement of a beautiful Bristol asset, which has been an integral part of the urban landscape of our city and much enjoyed by hundreds of thousands of visitors every year, by a high-density largely private housing estate. Many of the planned new perimeter buildings are in the form of long blocks two or more storeys higher than the Victorian houses to which they will be nearby. My understanding is that even what will remain of the gardens will not have a guaranteed future in perpetuity as a well-maintained facility for enjoyment by the public.

The Committee bears a great responsibility in its decision on the future of the zoo site.

Because there are too many negatives in the proposed set of plans, I urge the Committee to reject the current application.

Cameron Kennedy 25 April 2023

Nicholas Watts's Statement re: 22027737-F Bristol Zoo Gardens

I work with the informal Commonwealth, chairing the Independent Forum of Commonwealth Organisations ([www.ifco.online](http://www.ifco.online)) I was born and bred in Bristol, and have over 40 years' experience of teaching and research in environmental (climate and biodiversity) policy. Bristol Zoo Gardens is the second-oldest Zoo in the Commonwealth, an association of 56 countries and 2.5 billion people from the global North and South. (<https://thecommonwealth.org>). As such, it has global cultural and heritage significance that is also reflected in the Commonwealth diaspora of Bristol and in Bristol's maritime history. The proposal fails to acknowledge this historical context or the Zoo's variety of tree types.

Public awareness is growing of the importance of mature trees to the ecology of the urban environment and to the well-being of its citizens. The current proposal would remove over 40 percent of the Zoo's trees, most of these both mature and non-native. It is important to remember that 'Zoological Gardens' started as gardens with animals, and the gardens appear to have been given little regard in the proposal, as evidenced in the failure to follow recommendations to use the latest methodologies for calculating Net Biodiversity Gain.

Of some 65 trees scheduled for removal (see list from T007-T206), 4 are native species (9 silver birches, one fastigate hornbeam, one bird cherry and one poplar). The remainder include **49 (forty-nine) different non-native species**, all at one time properly labelled, a rich educational and recreational resource that will be lost. I am not aware of any reference to this variety and global resource in the Applicant's documentation or calculation of NBG.

A decision to grant permission would mean the irreversible loss of a much-loved community asset and of the opportunity to create a 'zoological garden' in an urban space that could, in time and drawing on expertise offered in the alternative visions that were not given proper consideration or consultation, compete for World Heritage Site status. If the South Gloucestershire motorway zoo should fail, it would be too late to revert to the urban one. The current proposal will entail a net carbon gain and biodiversity loss.

Please reject the application and give time to consider alternatives.

Dr Nicholas S.J. Watts FRSA

Chair, Independent Forum of Commonwealth Organisations  
Senior Research Fellow, Institute of Commonwealth Studies, University of London  
Member, IUCN Commission on Education and Communication  
Special Projects Advisor, Commonwealth Association of Museums  
Member, International Council of Museums (ICOM) Natural History Group (NATHIST)

Email: [nsjwatts@gmail.com](mailto:nsjwatts@gmail.com)  
Tel/WhatsApp: +44(0)7515393127

Statement re. 22-02737-F Bristol Zoo Gardens

To Whom It May Concern,

My family and I are very disappointed about the decision to close the Bristol Zoo. This Zoo has played a huge part in my two young children's lives.

Following the birth of my first one, Bristol Zoo became a calm space where we would easily visit and spend countless hours enjoying all that the space had to give. It was a safe space that was within an easy access and could allow the children explore without too much worry, where there was something for everyone.

Whether it was to marvel the beauty of the natural world, with the variety of the animals or the beautiful well-established gardens or to provide stimulating activities with the play park and the water play or to run around on the garden it was a place that enabled space that children could be children and where even us adults could learn. It was a space that would cater for birthday parties and weddings, would provide learning opportunities for schools and would accommodate with ease visitors from different ethnic backgrounds and age groups.

As beautiful as Clifton is, it doesn't provide particularly many opportunities for young families and children for recreation and the current proposal does very little to safeguard this for the future generations.

My youngest always adored the zoo and the animals, which installed complete utter love for them. His appreciation of animals is something I am very grateful for and eager to see if this passion he has will be something that will impact on his choices in the future.

With the convenient location of the zoo in Clifton and ease of access, it allowed for complete days out with friends and family as well as for a quick pop by after school. The current proposal/ offering of the Wild Place, due to its location is unlikely to become a stable part of a family life for many like the Bristol zoo did for 186 years. It is most likely to continue to be occasional visit but not really one where the membership has the same value as the Bristol Zoo. Whilst it is understood that some of the larger animals are better served by placing them in the suitable locations with sufficient space there are plenty of smaller animals that could have kept.

It is a great loss for the city of Bristol, as a whole, to lose the Bristol Zoo and Gardens, from so many aspects. Furthermore the proposal lacks consideration of the established spaces and doesn't add greatly to the community. Proposing number of housing that will likely be out of reach for most due to the cost rather than looking to provide an asset that would help the current community and that Bristol could be proud of is disappointing and greedy. I urge you to reject this proposal and make a lawful decision.

Dear Democratic Services.

Below is a statement I would like to give related to [22/02737/F & 22/02889/LA - Bristol Zoo Gardens](#).

I would like to present this statement in person please. Thanks.

Best wishes.

Professor John Tarlton (Bristol Tree Forum)

**The Local Plan (BCS9 and DM17) states that if a development results in the loss of trees, these should be replaced. The developer recognizes that the loss of 156 trees requires planting of 451 replacement, in accordance with Biodiversity net gain 3.0. They claim that this will be done on site, requiring 1.86 hectares, or 40% of the area of the development (4.81 ha). The Tree Planning Officer and the Planning Inspector agree that this cannot include trees planted in private gardens, as there is no guarantee that these would be maintained. It is not remotely feasible that this level of planting could be achieved within the site's communal areas, and as such this proposal cannot comply with core planning policies and should be refused on this basis alone. Were the current version of Biodiversity Net gain (BNG4) to be used, a total of 1384 replacement trees would need to be planted, requiring 5.63 hectares, or 117% of the site.**

Professor John Tarlton, BSc, PhD  
Professor of Regenerative Medicine  
Business Fellow and Impact Director  
Bristol Veterinary School  
University of Bristol  
Langford



FROM: Stephen LAYLAND

RE: WRITTEN STATEMENT [with supporting imagery] of objection.

## Development Control A Committee - Wednesday, 26th April, 2023 2.00 pm

9a 22/02737/F

&

22/02889/LA

- Bristol Zoo

Gardens

Guthrie

Road Bristol

BS8

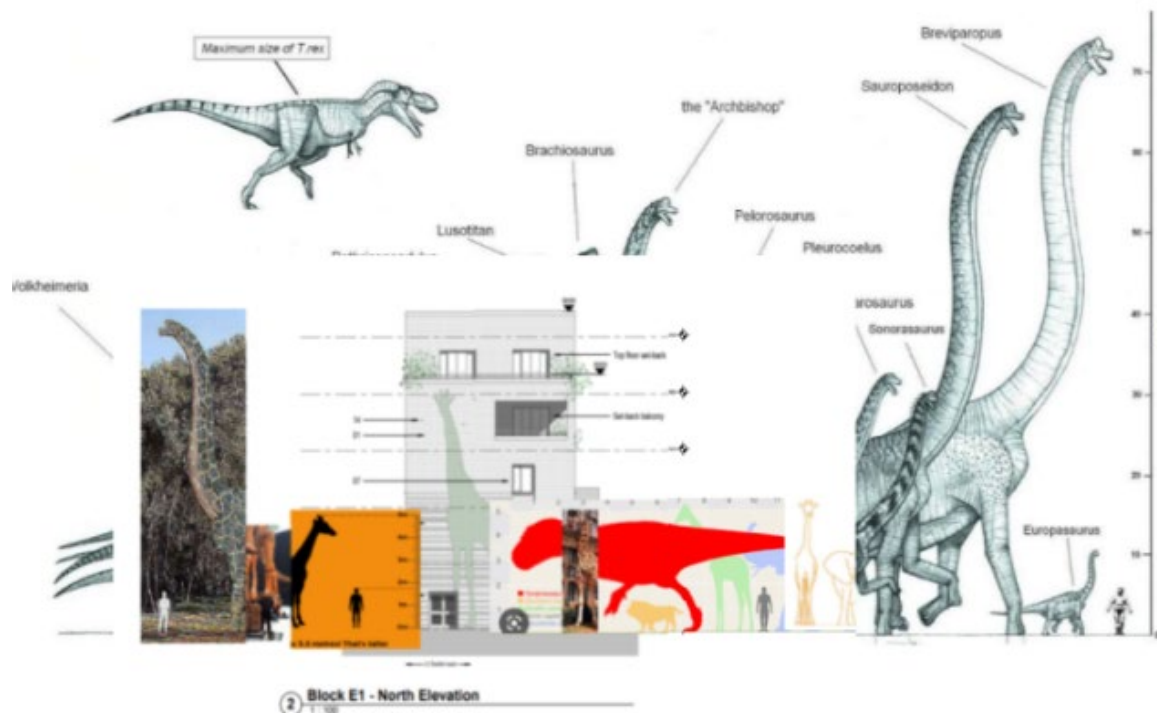
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May I ask the committee to allow me to voice a shorter digest of the following lines and points of objection:

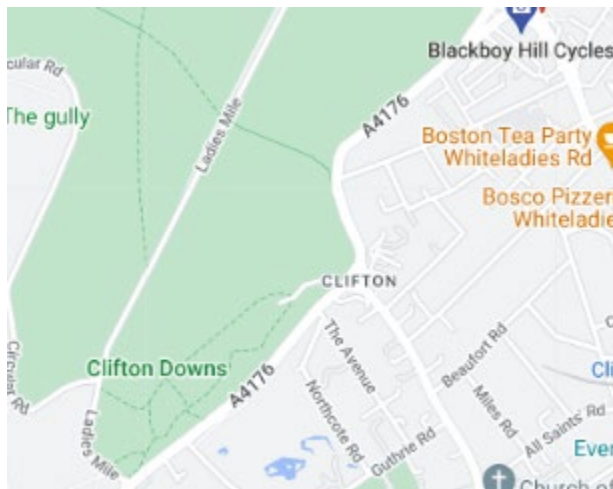
The following compilation of images is NOT provided to recommend some scheme to convert the development/site into some dinosaur exhibition/park.

The point to visually set the matter is to at once both calibrate the relative scale of the proposed redevelopment and set it within the terms of the wider context of the plight of a world on the cusp of extinction - as a sensible reality.



The broad rationale is the character of the district has been largely derived from structures and environs of the already existing Zoo complex. The implication is that the fortress-like frame and walled-massing of the proposal will at once simply remove and replace that relative datum - so hardly harming what itself had itself essentially defined.

The implication, however, is that the resulting inflation or boosting of property values would soon come to be quoted in the creation or establishment of the accepted "character" of some wider or longer wider precedent - enabling the redevelopment of the whole of the longer stretch of the **A4176** route toward Black Boy Hill., all overlooking the prospect over the Clifton Downs. The latter tendency - of linear [Domino-like] high-rise creep - would only make it even more important to establish the seed of some more aesthetically challenging/ambitious president at *this* outset, or risks thereof.



According to the foregoing reasoning - once coupled with import of the advent of the "**global anthropocene**" - is that the planet's precarious/vulnerable state could not be legitimately [logically] held to be threatened or compromised by any human undertaking, simply because it has since become defined, and henceforth, as the very character of human undertakings - a.k.a thereby forming self-referential "floating" datum.

The argument for the foregoing president [of a brakeless spiral] is logically perverse - a logical sleight-of-hand or Professional Foul.

The licence of the regulations and guidelines and plans accept that developments/developers should be expected or even be required to realise **optimum viable use**.

At the risk of showing a woefully-naïve lack of corporate cynicism [on my part] for the Zoo to be deemed worthy of its caring aura the conserving [caring] premise should be more enlightened <sup>that</sup> to simply accept the follow

the steer that the most unscrupulous and knavish developer would be happy to agree.

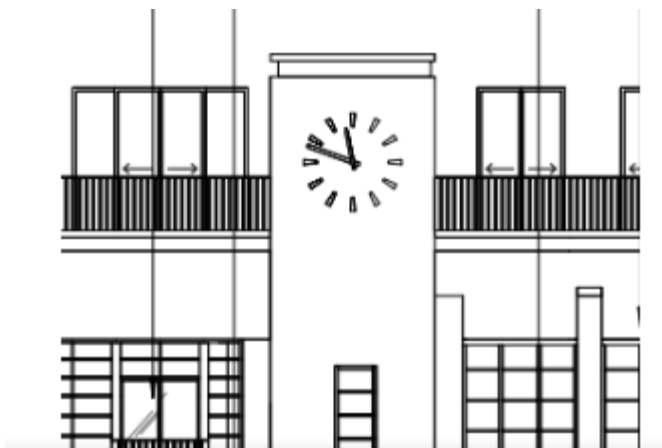
The latter would resemble the lack of a wider and deeper ethics of those that had opted to attach inflammable cladding to the facade of Greenfill Tower - and fully within the terms of the lawfully adopted regulations - would have readily met the criterion of providing for optimum viable use, **or other than when required to account [factor-in] the wider and longer-term costs.**

Were the redevelopment of the already-existing Zoo deemed to be even necessary, the onus would for the Zoo/Bristol to treat the challenge of the redevelopment as an opportunity - to prove the principles of more widely and deeply replenishing architectural ethics, or more than being just reduced to the ***optimum viable use***, in the narrow [simply countable] sense.

The essential prospect and ambition has clearly been to cram as much development into the walled frame of the fortress-like site as the regulations and guidelines would allow - **as if within externally imposed constraints.** The terms of the proposed redevelopment would otherwise or readily allow the doubling or tripling of the height of the perimeter walls - i.e. clearly admitting or recognising NO inherent limitation of scale of the heights of the redevelopment.

The most telling criticism, however, is that the principle of maximizing the value of obtaining planning permission on the foregoing basis - as would be avidly sought by the most unscrupulous knavish speculator - can be held to have

brought the global environment [hospitable to humanity, widely defined] to the brink of sensible extinction - in the tenable [any recognisable] sense. Once that criterion is widened to include the need to also provide a hospitable planet for the erstwhile "subjects" of Zoos - as distinct from humanity, so to speak - the import of adopting the "asset-stripping" approach to re-development - "extracting" the maximum value from the many inherent advantages of this prime **location, location - location** - would appear to be either self-contradictory [refuting the supposed aura and ethos of Zoos] or perverse in the extreme sense of "re-wilding" [the whole planet] through [following] the sensible extinction of humanity.



While some might discount the latter implications as simply ridiculous, humanity should at least be allowed to properly question the root premise and the current and future purpose of the Zoo. For Zoos to show themselves to be here discounting any responsibility to prove some wider and deeper ethics - especially given this rare opportunity - then all may ask what is their true ethos[?], or other than notionally providing ready access and membership of some polite [P.C-creditable] society, and careers therein and thereof?

In terms of architectural design, the strong steer of the prospectus framing some such walled "fortress-like" enclave is premised on the architectural contrast or counter-point - somewhat analogous to the counterpoint of Frank Lloyd Wright's Fallingwater House.

Once the view against the context and backdrop of that forested setting is reviewed it is easily recognised that its pleasant prospect essentially depends on the strong counterpoint between the smaller house itself within, or set once against the wider and higher context - of the backdrop of the all surrounding forested hillside.

The report discounts the harm to the sensed character of the built context - albeit through the Professional Foul of some merely logical sleight-of-hand - it is revelling and symptomatic that the ugly economy of the form and roof-line of the proposed massing appeared to depend of the latter being largely obscured by trees, or should they come to be viewed from behind or within those woods. The recommendation of that tacit apology is hardly encouraging.

The more obvious view prospect would be from and along the A-road - A4176. The sudden change of character would be startling - shocking.

Yet despite that attractive result, that aesthetic effect objectively depends on some work of "extraction" - subtracting [so diminishing] the character of the forested [treed] hillside prospect and setting. The latter work of extraction might be held to involve some syphoning-off - akin to being vampiric!

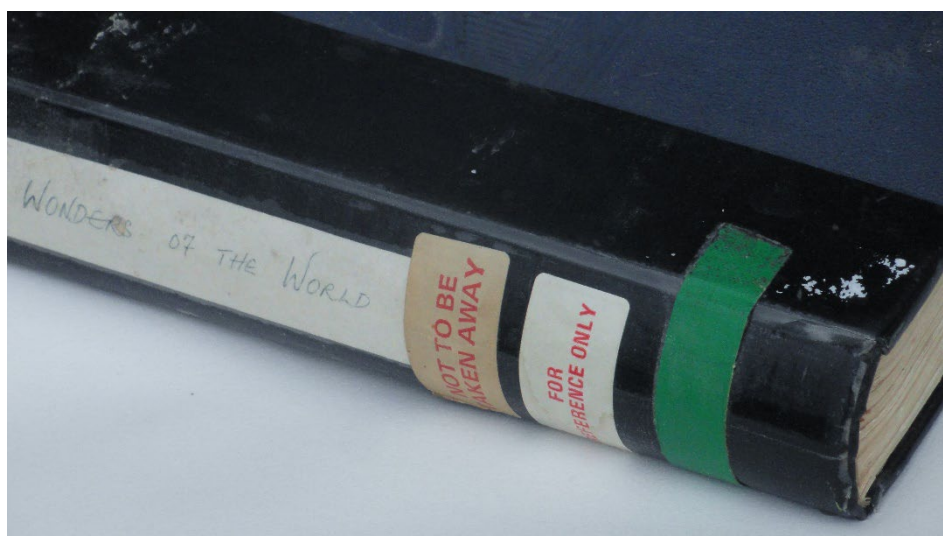
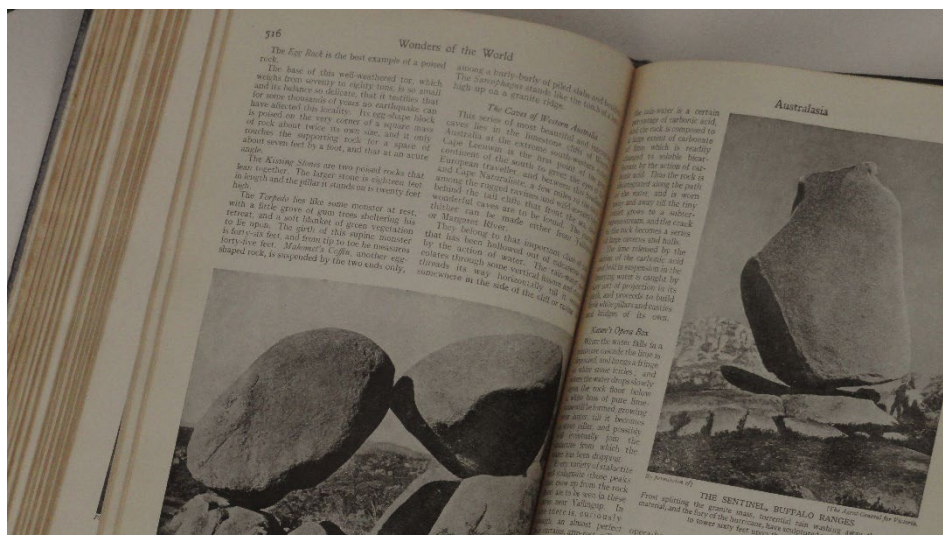
The premise of seeking full planning permission would clearly invite the most unscrupulous and careless [knaveish] developer to adopt the most cynical approach to degree-zero design - to depend on the most cynical logic - trading-off or maximising the differential between architectural merit and costs. It is said that it is most profitable to settle for less at outset, on the premise that value of any subsequent development will be maximally boosted - hence the location, location, location precept.

Once the many many many advantages of the location, location location are listed, the abject cynicism of the Zoo landowners can be recognised in their willingness to set the aesthetic-expectations so basic or nominal level - not as the ethics of architecture qua architecture but check-list [degree-zero] design [a.k.a] just building.

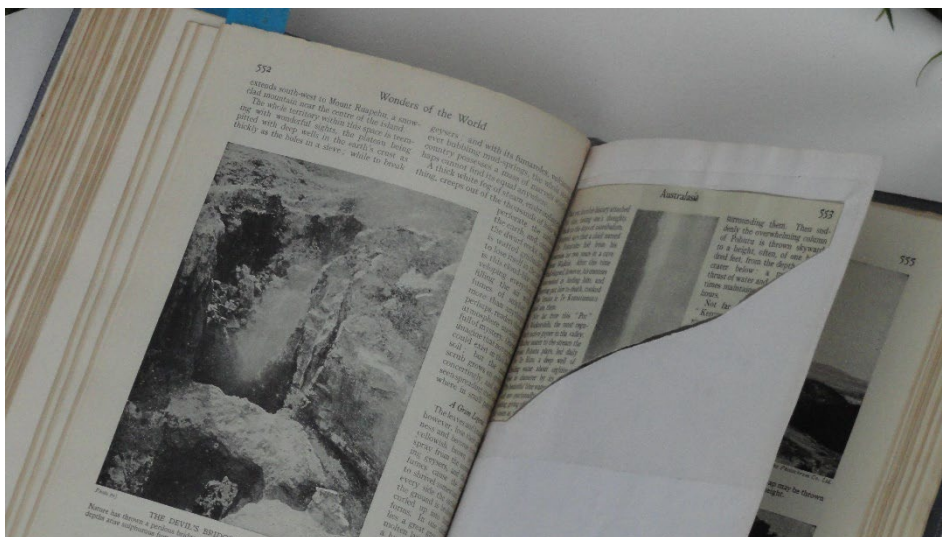
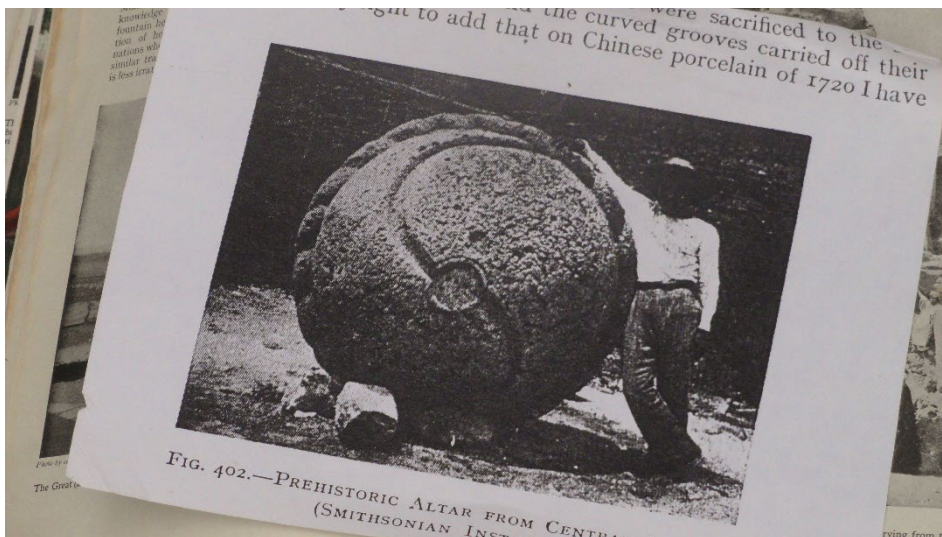
While the latter steer or prospectus might still allow some more caring developer to transcend or exceed those base expectations it would inevitably both invite some higher bid by the least scrupulous developers, while doing nothing to

imply that the Zoo would favour or give greater weight to some wider and deeper architectural ethics.

The very frame of the walled-around "fortress-like" enclave would be felt to convey mixed-messages - at once both notionally inviting yet repulsive. The purpose-made lake would become an ice-rink over the months of winter. The notional conceit would prove impossible to confidently police.







## **Vassall centre Fishponds Bristol.**

**Submitted by: David Redgewell - Bristol disability equalities forum trustee.**

### **Questions 1 .**

What account did Bristol city council make in recommendation on this housing and community Development.

Failing to have any public transport services to oldbury court.

By the west of England mayoral combined transport Authority

Which has no money been sort from the Developer toward a green travel plan

And a public bus service.

Not just cycle parking.

As this proposed development is not on a bus route as per objection from the community.

### **Officer Response.**

*Bus stops are provided on Gill Avenue with an eastbound stop adjacent to the site frontage and a westbound stop opposite the site. Shelters, timetables and raised kerbs are provided at each stop with real-time bus information also provided at the eastbound stop.*

*The bus stops serve the no. 5 service that operates typically half-hourly during the day Monday-Friday and hourly on Saturday and Sunday between Downend and Broadmead in the city centre via Stapleton, Eastville and St Werburghs.*

*Additional regular buses stop on Fishponds Road some 450m south of the site adjacent to and opposite Straits Parade where bus shelters, raised kerbs and real-time bus information are provided.*

*The above stop includes the No.48 which runs through part of Oldbury Court.*

*A Travel Plan has been condition if the application is approved subject to a S106 agreement to secure a travel plan audit fee.*

### **Question 2 .**

With convention of the centre to housing what consideration been given to affordable housing to fill the needs of Bristol housing waiting lists .and housing for people with reduced mobility and wheelchair users to M standards.

What community facilities will remain on this site .

## Officer Response.

*This application relates to Phase 1 of the development only and no C3 residential housing is proposed in this consideration. However Phase 2 of the proposal is likely to come forward as 100% affordable housing development which is over and over policy compliant affordable housing levels. This element would be considering during a further application.*

*In Phase 1 there will be 40 no. 1 and 2 bedroom apartments, operated by Bristol Charities, for older people from across Bristol who are in need.*

*The majority of people Bristol Charities supports are on the lowest incomes or housing benefit. The proposed housing for older people will be let at affordable rents.*

*There will be 8 one bedroom apartments on floors two and three of the Gateway building providing eight units of specialist supported housing that will be made available by Bristol Charities to residents with complex support needs.*

*Within the housing for older people all of the 1 bed apartments are designed to Part M4(2) standards and all of the 2 beds are wheelchair accessible Part M4(3). All of the specialist supported housing units are design to Part M4(3).*

*The site is level with gradients no greater than 1:21 and all buildings will have level thresholds. Lifts will be provided in all buildings and an evacuation lift will be included with the hub.*

*The hub building has been designed to accommodate the full spectrum of physical and neurological impairments. Facilities such as hearing loops, alarms that flash as well as sound, consideration of*

*colour palette and specification of ironmongery etc. will be incorporated to ensure a fully accessible building. Level access from car park and landscaped heart enter into the same point. Double height space by the reception assists wayfinding and orientation with a view up to the lift landing point on the first floor. View through the building adjacent to the lift core at every level helps*

*with a sense of orientation when navigating the building vertically.*

*Rooms sized to accommodate wheelchair turning circles.*

*Accessible WCs on every floor and a 'changing places' facility on the ground floor.*

*Phase 1 it is proposed to include the following:*

*Housing for older people with associated lounge and communal facilities (Class C2 – residential*

*institution) – this will comprise approximately 40 units with a mixture of 1 bed and 2 bed units (3423 sqm);*

*Specialist Supported Housing for people with learning disabilities (Class C2 – residential institution)*

*– this will comprise 8 x 1 bedroom units (662 sqm);*

*2116 sq m Class E (g)(i) (re-provided office space referred to as “The Hub”);*

*353 sq m Class F2 (b) (meeting places for the principal use of the local community) - this is known as “community space” on the ground floor of the Gateway building;*

*294 sq m Flexible Uses: a nursery, crèche or day centre (Class E(f)) or non-residential training, employability and education centre (Class F1(a)), a cafe (Class E(b));*

*77m2 sq m Class E (b) (café).*

## **Vassall Centre Planning Application**

**22/03476/F**

I am astounded and disappointed on reading the Public Document Pack in relation to the forthcoming Committee A meeting of 26 April at 2.00 pm at which the plans for the Vassall Centre development will be discussed. I am most concerned that the 89 objections to the scheme have not been included in the Officer's Report. It is imperative that these objections be received and read by the members of Development Control A.

I am appalled that no mention is made of either Willow Bed Close or Little Hayes, two roads where the proposed development will have major impact.

I consider that there is plenty of space on this large site for a spacious two storey Vassall Centre style Business Hub for disability charities. This arrangement would create a less densely populated space with less traffic and parking requirements. The project would be cheaper to build and the timeline would be shorter. This would involve minimal disruption for the neighbouring residents and would be respectful of the wellbeing of all concerned, both neighbours and of those who would ultimately accommodate the new proposed development. I fear that if the present proposals were to be passed and if Phase 2 were ultimately to follow suit, then the building of this site would have a serious impact on the residents in the Willow Bed, Little Hayes area. The homes in these streets are relatively small, 2 storey homes with very average sized gardens and the roads referred to are narrower than those on Gill Avenue and Vassalls Road, and will therefore be greater affected by the proposed development. As it stands, the gardens of the homes in the Willow Bed Close and Little Hayes development presently receive sufficient light and the area is subject to little disturbance from noise, litter, noise/air pollution, due to not being overlooked by high rise building. The Vassall Centre proposal to build so many homes in such close proximity, and so densely packed together, some of which are planned to be 3 storey, is going to seriously impact on the wellbeing of the existing residents and of the residents of the newly proposed development. There will be major implications for the roads and access and will lead to greatly increased noise, pollution and traffic chaos. The plans show very little green space and the development will be in danger of resembling a prison.

Consideration must surely be taken of the gradient of the ground from the entrance to the Oldbury Court Estate through the existing development of homes built in 1999 towards the Vassalls Centre. The land rises so the impact of a dense 3 storey development on Vassall Centre is going to seriously affect the light reaching the existing houses and gardens in Willow Bed Close and Little Hayes. My concern when submitting this proposal, is that little or no regard is or has been taken of the impact upon the above mentioned area - It is as though it does not exist. Gill Avenue and Vassalls Road are the only roads mentioned, and these are wide roads with large well-spaced houses. Also the 3 storey flats which are mentioned in the official documents are situated well back from the wide road and surrounded by a good amount of grass. They also do not overshadow other properties and the

shadows created by these buildings are retained within their own development, which will not be the case with the proposed development – **VC development is too densely packed and too close to other houses.**

**It is imperative therefore that the whole Planning Committee make a Site Visit to Willow Bed Close, Little Hayes, Oldbury Court Drive to see for themselves how close all the neighbouring houses are to the proposed 3 storey buildings.**

### **Objections**

- 1 Proposed change of use away from a hub for charities / loss of services for the disabled.
- 2 Overbearing 3 storey buildings are not in line with the predominant character of the local area. Existing 2 storey homes on Vassall Road, Little Hayes, Willow Bed Close and Gill Avenue are all nearer neighbours than the 3 storey flats, which are set away from the road and in grassland, sufficiently spaced and further down on Gill Avenue, and the shadow they create does not impact on other properties. These are not 'local building style'
- 3 The proposed development will result in loss of privacy/overlooking of neighbouring houses and gardens
- 4 3 storey buildings impacting on neighbouring houses, which under legislation are protected by 'right to light' Homes and gardens around the immediate perimeter will be overshadowed by taller buildings losing privacy, natural light and sunlight.
- 5 Houses backing onto the site will experience constant noise from vehicle parking, service vehicles, bin collections etc. all proposed to be situated at the rear of the site right next to residential housing.
- 6 This would cause disturbance, unacceptable intrusion in the form of noise nuisance, general disturbance, odour, pollution, security light pollution.
- 7 The development may lead to a significant impact upon road safety.
- 8 The proposed development suggests gross overdevelopment/overcrowding which is not acceptable for the new or existing residents.
- 9 The new proposed development must blend in with the surrounding neighbourhood.
- 10 3 storey buildings cannot be approved as this will lead to more 3 storey applications in phase 2 of Bristol Charities project at the Willow Bed Close and Little Hayes end of the site.
- 11 There will be greatly reduced car parking on the site, along with the high density of accommodation, leading to yet more traffic and cars parking on our streets which already have restricted parking due to the recent addition of double yellow lines on our roads. The area to the rear of Vassall Centre leading towards the park is presently a wildlife haven for bats, foxes and birds and we wish to retain this. The area presently has minimal light and noise pollution.

I am against the prospective amount of noise, dirt, pollution and disruption for the next 3 /4 years.

I oppose the Passage into Willow Bed Close

G M Stone

Resident of Willow Bed Close  
2023

19 April

Hello,

This email is in objection to the following planning application;

Planning Application 22/03476/F Vassall Centre, Gill Avenue, Fishponds BS16 2QQ

By: Martin O'Leary

I object fully to the proposed development. On the following grounds:

- Overbearing 3 story buildings/out of character with neighbouring streets
- Gross overdevelopment/over crowding
- Traffic issues and more on-street parking.

The area is already overcrowded with homes with inadequate space - this is just another example of greedy developers not caring about the area but squeezing as much into the smallest area possible to maximise their profits.. There is a significant lack of provision for parking in the area as it is adding more homes will only worsen this, simply travel through the area and look at the number of cars parked on the road. I hope that there is no major emergency incident as emergency vehicles will not be able to pass through a lot the time. The Linden/Vistry and Barratt Homes a very recent example of no thought given to where residents park. Further worsened by the council's decision to now charge for parking at Oldbury Court making the side streets even busier as park users avoid the charges.

I ask that the panel see sense and consider the people that you local people who call Fishponds their home - not the businesses that suck all the money at of the smallest space and move on to the next area leaving those who cannot afford to move on deal with the mess they so inconsiderately created.

Kind regards,  
Martin O'Leary



**WRITTEN PUBLIC FORUM STATEMENT - THE VASSALL CENTRE DEVELOPMENT****Julian Mines, CEO of Bristol Charities – applicant for the redevelopment of The Vassall Centre**

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**Big Vision/Development Aspirations**

The development brief and vision for the scheme is to create a vibrant mixed-use new neighbourhood centre for inter-sectoral and multi-generational living and working that encourages collaboration between a variety of stakeholders to promote an integrated, healthy community, delivering:

- **Community Transformation** – a standout community centre and spaces, hosting essential services for residents and projects/organisations, positively impacting health and wellbeing.
- **A centre of excellence for the Voluntary Sector** – high quality, accessible, and affordable work and meeting spaces, and enhanced client services available locally and city-wide
- **Transformed lives** – Affordable housing, communal spaces, and support services for a mix of ages and needs, with access to on-site and off-site services and integration with the local community.

**Community engagement**

We were keen to take the community with us on this development journey, so we engaged with key stakeholders and those living and working in the community to inform the emerging design proposals, prior to finalising the scheme for planning.

Early engagement began in May 2021 involving tenants and one of the ward councillors. This was followed by two rounds of wider public consultation in November 2021 and May 2022. Between each round there was further engagement with tenants and local ward councillors, a separate community uses survey, and peer review by Design West.

Over 270 residents/neighbours were directly mailed about the consultation arrangements in round 1, which was expanded to over 400 in round 2. Fishponds Voice magazine also carried regular news items to further publicise the consultation events.

Over 130 people attended the events in Round 1 and there were 75 survey responses. A further 40 people completed the community uses survey. A total of 40 people attended the consultation events in Round 2 and there were 23 survey responses.

**Bristol Charities commitment and early community impact**

Bristol Charities is committed to enhancing the work of the Vassall Centre both on-site and beyond. We will manage the site and the various state of the art spaces that will be created through the development proposals and have already relocated our Head Office and team from the City Centre to the Vassall Centre, which will be our long term/permanent base. Therefore, we very much have a vested interest in the site and look forward to a high-quality working environment for existing and future tenants and employees.

Early community development work is underway, in part as a response to the cost-of-living crisis, working with Bristol City Council to establish a 'Welcoming Space', providing much needed

infrastructure, support, and funding to local projects, and establishing the Centre as a community hub providing support to the local neighbourhood around food poverty, appliance/energy poverty, and family support. Long term relationships with key agencies including Primary schools, Secondary School, Children's Centre, and after school and early Years providers have been established. We have hosted community events including "We-The-Curious" workshops and summer and Christmas fayres to foster and maintain community engagement. We have secured funding for 2 Community Development Workers and have attracted funding into the area for food and community projects.

This work not only demonstrates our commitment to the Fishponds neighbourhood but also provides some early evidence of the work we will be developing in an area with high levels of deprivation that will be further enhanced and extended when the proposed development is operational.

### **A new, standout Voluntary Sector Hub; enhancing and extending provision**

Our ambition is for the development to significantly enhance the work and service provision of our existing and new tenants. The 'Hub' building will provide affordable, high-quality office, meeting, and workshop space for a wide range of Voluntary Sector and not-for-profit organisations delivering essential services to local and city-wide client constituencies. The 'Hub' will support the Voluntary Sector across the city enhancing their work, plans for growth, and improve the experience of visiting clients through the provision of workspaces, and visitor spaces on a scale and to a specification that would not be currently available.

Much has been written about the potential loss of accessible meeting and event space, which has been a longstanding feature of the Vassall Centre. Whilst the ground floor provision of conventional meeting spaces in the 'Hub' has slightly reduced, there is additional meeting space on the 2 upper floors, but also meeting spaces re-provided across the whole scheme, which actually increases the amount of bookable, accessible (and ground floor) community meeting and event spaces. This specifically includes two foyer spaces, exhibition area, communal spaces, the café, and flexible meeting spaces on the ground floor of the Gateway building, as well as the central open landscaped space for good weather events.

### **Transformed communities and lives**

Building on our early community work, the site will allow for a significant upscaling of this and on-site Providers' work, as well as provide resident access to new, enhanced, and quality facilities and services that will impact lives locally and from across the city accessing on-site provision, through:

**Community Café** – A café will be open to the public as well as the existing tenants and service users at the site. The café will provide work experience and training for local people and adults with Learning Disabilities. The popularity of the existing Vassall Centre café demonstrates that there is currently a need for a café and the demand will increase as our on-site community activities attract local residents onto the site. In the summer months overspill seating will be available for users of the café in the public open space.

**Accessible Centre for Employability, Learning, and Training for young people and adults with disabilities** - The original plan included a nursery co-located with the Housing for Older People. Following on-going consultation with residents and the early years community we have broadened the potential uses for this space within the development so that we avoid any damaging disruption to existing/future provision that may result from a fluctuating market. If a nursery is not a viable proposition at the time of development, we will achieve our multi-generational aspirations by working and connecting with off-site provision. We would have

the option of re-purposing this space, and when combined with existing on-site provision, will create an enhanced Centre for Employability and Training centre for young people and people with learning disabilities.

**Community Space** - The ground floor of the Gateway comprises of a bookable community space adjacent to one of the main entrances into the site and linking it with Gill Avenue encouraging use and accessibility. The demand for this kind of space is extremely high, evidenced through our consultation work, but also our early work to date as we respond to immediate local need to access space for activities and services, enhancing health, wellbeing, and combatting social isolation across all ages.

**Supported Housing for Older People and people with Learning Disabilities** – In addition to the 40 units of affordable housing for older people, there will be eight one-bedroom apartments on the first and second floors of the Gateway building providing eight units of specialist supported housing that will be made available by Bristol Charities to residents with complex support needs. This housing offer has been designed to reflect the varied and complex housing needs of people with a range of differing physical abilities and wider support needs, addressing accessibility, sensory and enhanced safety requirements whilst delivering each resident their own home and an opportunity for independent living. The need for these units has been confirmed by **Bristol City Council's Adult Social Services officers**, who have been instrumental in scoping the mix and design of the units and their ancillary provision. We have undertaken several meetings with the Council in parallel with the application preparation and determination.

**Landscaped heart and sustainability** - The scheme proposes a large, landscaped heart which will provide much-needed outdoor recreational space that is usable throughout the seasons and delivers ecological enhancements to the site and the neighbourhood including tree and shrub planting, creation of habitats, swift boxes, and insect hotels. This will add to the range of climate action and sustainability projects that we are supporting locally, alongside the new buildings that will be modern, low energy constructed to Passivhaus standards. Existing and future users of the site and the wider community will enjoy the landscaped heart.

From a planning perspective, the headline benefits to the scheme include:

- The intensification of a currently under-developed brownfield site in a sustainable location.
- The provision of much needed community uses alongside current employment space.
- An innovative mixed-use scheme with specialist housing for older people and people with learning disabilities.
- The replacement of obsolete buildings with very poor environmental credentials with modern, low energy buildings and
- The creation of and access to better public open space and enhanced biodiversity.

A key objective for Bristol Charities is to phase the development so that the Vassall Centre users who want to remain are not displaced during construction and therefore there will be a careful phasing programme in place to ensure their seamless transition into a new mixed-use site. The 100% affordable housing scheme on the remainder of the site will come forward in Phase 2 and will be subject to a separate planning application.

Our hope is that the development of the entire site, attracting a wide range of holistic services and service providers, housed in standout facilities, and supported by Bristol Charities community

development work, will generate significant benefits and impacts both locally and across the city, transforming lives, families, and neighbourhoods, challenging deprivation, injustice, and inequality.

**Julian Mines, CEO, Bristol Charities**

Dear Sir/Madam,

Please find below my Public Forum Statement for the committee's consideration on 26th April.

I strongly object to the plans to redevelop the Vassall Centre for the following reasons.

The Vassall Centre is a very valued asset within the community and wider area. It does not sound as though all of the current tenants and their associated services and facilities are being accommodated within the new plans. I object to the 3 storey buildings. They are very overbearing and look completely out of character within the local area. This area is residential and predominantly 2 storey. I also feel that the site will be very overdeveloped and out of context for the area. It will be much busier and increase traffic and parking needs in the locality. The parking provision in the current plans does not look sufficient for the size of the development and will likely worsen parking problems that are already experienced here. This would be unacceptable.

Yours faithfully,  
Nigel & Lise Bishop

**Planning Application 22/03476/F**  
**Vassall Centre, Gill Avenue, Fishponds BS16 2QQ**

To whom it may concern,

I am writing to object to the planning application for the Vassall Centre, Gill Avenue, Fishponds. I believe that this development will have a negative impact on the local residents and the environment.

The proposed development consists of overbearing 3-storey buildings that will block the light for some residents, overlook a lot of properties and be out of character for the area. The buildings will also cause a loss of privacy for many residents as they will overlook neighbouring homes and gardens. Furthermore, the buildings will create a loss of sunlight by overshadowing neighbouring homes, especially in winter.

The development also represents a gross overdevelopment and overcrowding in a very small area. There is a lack of adequate parking being accounted for in the plans, which will lead to more parking issues in an area that already struggles due to the local park. This will also result in more traffic congestion and pollution on the already busy roads. Additionally, the proposed pedestrian access between Willow Bed Close and the Vassall Centre site will create security issues for the residents of both areas.

The development will also entail a change of use away from a hub for charities that provide valuable services for the disabled and vulnerable people in the community. This will cause a loss of these services and reduce the social value of the site.

Moreover, the development will cause 24/7 noise, traffic and security light pollution to the immediate neighbours, affecting their quality of life and well-being. The construction phase will also bring noise, dirt, pollution and disruption for the next 3 to 4 years.

The biggest issue we face from construction is asbestos. The old premises that will be demolished likely contain a lot of asbestos materials that will be released into the air and come into contact with the neighbourhood. As a father of two young children, I am very concerned about their exposure to asbestos as it is extremely harmful and can cause serious health problems such as lung cancer and mesothelioma. I do not want my children or anyone else in the area to suffer as a result of this development.

Therefore, I urge you to reject this planning application and protect the health and well-being of the local residents and the environment.

I also request that you arrange a site visit for the whole planning committee to see how close all the neighbouring houses are to the proposed 3-storey buildings and how they will affect their living conditions.

Yours sincerely,

Henry

Dear Sir/Madam,

Ref:- **Planning Application** 22/03476/F – Vassal Centre, Gill Avenue, Fishponds, BS16 2QQ

**Resident** – Cassim Hansrod – Willow Bed Close

I would highly recommend and encourage the members of the Planning Committee to visit the proposed site. This will provide an opportunity to determine the merits of having this current proposed development will have to my home and surrounding neighbours and experience the current peaceful neighbourhood I am residing in.

I am raising a planning objections (detailed below) related to the above planning application 22/03476/F.

The key objections are:

- Significant overdevelopment in a very quiet and peaceful neighbourhood
- Overbearing and out of character multi storey buildings and not keeping with a residential surrounding homes.
- Privacy intrusion (height of proposed development) within my garden and home due to the size and location of the proposed development
- Overshadowing caused by multi storey building
- Light pollution from oversized buildings spoiling the horizon for night star gazing
- Noise pollution from increased traffic
- Traffic congestion and lack public/private parking resulting from increased residential demands
- Significant noise and polluted roads during development phase which will become enduring
- Deterioration of surrounding public roads (Gill Avenue and Fishponds Straits), currently overburden with car traffic leading to numerous pot holes.
- Peace, security and privacy threatened by having a public pedestrian access provided between Vassal Centre site and Willow Bed Close.

Yours sincerely

C Hansrod

Development Control Committee A  
Development Management  
Bristol City Council  
PO Box 3399  
BS1 9NE

19 April 2023

**RE: Statement of continued objection to Bristol Charities proposed development  
Application - 22/03476/F**

We, The Driving and Mobility Centre (West of England) are a Community Interest Company and current occupier of leased office premises and garage/storage facility within the Vassall Centre. Our current occupation combined footprint is some 378.44m<sup>2</sup>.

We are a member of the national charity Driving Mobility, and we form part of its national network of Mobility Centres, serving the Bristol community and the surrounding areas with the majority of our clients living in BS postcodes. Our organisation has operated largely uninterrupted from the Vassall Centre for over 25 years. We uniquely conduct specialist assessments and offer advice for driving with disability and medical conditions, vehicle passenger access and powered mobility for people requiring mobility solutions and transport advice. We employ a dedicated and professional team of qualified practitioners to be able to offer our community this essential service at a rate of over 1000 referrals per annum. Our service users are, among others, referred from the DVLA, Motability, Avon and Somerset Police and the NHS community. The Department for Transport is one of our major stakeholders, supporting the essential work that we do.

Having read the officer's report and positive recommendation, we completely and utterly contest the conclusive statement given under the section 'Key Issues: A, Principle of Development – Protection of Community Facilities'. The report states, "The proposal is considered to comply with Policy DM5 iii as the community facility can be fully reinstated as part of any redevelopment of the land and is therefore considered acceptable". We draw your attention to the fact that as a current tenant, with community interest forming the bedrock of our constitution, no provision is included nor has been offered nor negotiated to 'fully reinstate' our community facility under this application. What has been offered by the applicant to accommodate or reinstate our future operation from the developed site is the possibility of a small office located on the **second floor** within the new Hub building. This in no way provides for re-instatement of our facility considering our current 370 m<sup>2</sup> **ground floor** footprint includes 4 offices, a reception area, staff area and a purpose-built privately funded space for storing and maintaining our vehicles and equipment which are specially adapted for use by disabled people. The plan also removes the capacity for us to be able to allow drivers an 'off-road' safe environment to become accustomed to adapted vehicles by significant removal or reduction of the perimeter car park and access lanes.

The claim made by Bristol Charities that, "we will continue to accommodate **all** existing tenants as well as seeking new tenants when space becomes available" is in stark contrast to what has so far been offered. The current application if approved and enacted will enforce a costly relocation or cessation of our Community Interest Company which is in



further contrast to the statement reported by the planning officer that “The redevelopment of the Vassall Centre site provides an opportunity to retain and improve on the services provided at the Vassall Centre to better serve the local community”.

It is our belief that not one of the four criteria given below in Policy DM5 to allow for development has been fully satisfied under this current application given the total adverse effect over our community facility:

- i. The loss of the existing community use would **not create, or add to, a shortfall\*** in the provision or quality of such uses within the locality or, where the use has ceased, that there is no need or demand for any other suitable community facility that is willing or able to make use of the building(s) or land **\*cannot be satisfied**
- ii. The building or land is no longer suitable to accommodate the current community use and cannot be retained or sensitively adapted to accommodate other community facilities. **Cannot be satisfied**
- iii. The community facility can be **fully retained, enhanced or reinstated\*** as part of any redevelopment of the building or land. **\*Cannot be satisfied**
- iv. Appropriate replacement community facilities are provided in a suitable alternative location. **Cannot be satisfied.**

We would be happy to pass further comment relating to our concerns and are willing to work with the applicant to seek a mutually satisfactory resolution. We would like to register to speak at the Committee meeting.

For and on behalf of the Board of Directors.

Hello,

I live directly opposite the Vassall Centre of the corner of Gill and Vassall Rd and overlook the site.

I have two objections to raise with the proposed.

1. Three stories is out of place in the neighbourhood. Perhaps setting back the third floor a distance will give the impression of not being imposed on.
2. The current tenants use a lot of onsite parking and I am concerned I wouldn't get a parking spot on our street. This would in turn lead me to pave my front garden so to have private parking and in doing so remove the lovely grass verge and turn Vassall Road into a carpark. Currently it is lovely and green the section we live.

Would be great for the planning committee to make a site visit to the corner of Gill and Vassall Rd and imagine the square block that will dominate the street visuals and change the character of the area.

Kind regards

Chris J

Dear all,

Here again I would like to emphasis my objection to the captioned subject planning which will not only cause asbestos, noise, pollution to all neighbours live here. In addition, the proposed 3 storey buildings extremely out of character with neighbouring streets, so please seriously consider our concern with making a SITE VISIT to see how close all the neighbouring houses will be.

Thank you

Yiu Choi Ha

I write to express my concerns over the plans for planning Application 22/03476/F Vassal Centre Gill Avenue Fishponds BS16 2QQ.

My concern is over the lack of parking spaces provided for the residents of the centre and visitors.

There are not enough spaces provided within the centre and this means cars will be parked in the surrounding areas. My wife and I live in Willow Bed Close where the parking is crowded partly due to the recent yellow lines. Cars being forced to park on the pavement at times. As the road surrounds the centre many will try to park in the road.

There is a suggestion that a direct pathway will be built between the centre and Willow Bed Close. This would lead to many more drivers trying to use the road as a parking lot and making life much more difficult for everybody.

Perhaps it would be to the benefit of everybody if the committee members could meet with some of us so that an agreed way forward which is reasonable to everybody can be discussed openly.

R.H.J. Hutton

Hi

As none of the feedback from the immediate neighbourhood has been taken into account on your second proposal I object to the current plans for all the same reasons as in my initial objection.

I heavily object to erecting three storey buildings on the existing site as they would be completely out of character with the surrounding area. There are no three storey buildings in the near proximity. It's going to look extremely out of place and overpowering.

The height is going to have an impact on the light the houses and gardens adjoining the site will get, especially those in Little Hayes and Willow Bed Close, immediately next to the site. Those residents' privacy is being compromised as people in the new buildings on the higher floors will be able to look into the people's windows and gardens.

I urge the whole Planning Committee to make a site visit and see for themselves what the area surrounding the site looks like and how inappropriate a three-storey building would appear in this neighbourhood.

In addition, there is little parking provision on the new site for the people living and working there. I live in Willow Bed Close and we already have a lot of people parking in our streets since the introduction of parking charges in Oldbury Court car park, and the lack of parking on the site will make the situation even worse. It's not just the people parking in Little Hayes and Willow Bed Close, it's also the traffic from those driving into the area, not finding a space and having to turn in the narrow cul-de-sacs and drive out again.

The proposed pedestrian access between the Vassall Centre and Willow Bed Close is unnecessary and will cause security issues and additional noise for residents in Willow Bed Close and Little Hayes. There is access to Willow Bed Close, Little Hayes and Oldbury Court park on either side of the Vassall Centre and there is no need for a short cut route in between.

Kind regards

Diana Patrick

Hello

Ref. 22/03476/F Vassall Centre, Gill Avenue, Fishponds, BS16 2QQ

Please see my objections to the above planning application.

We have 2 children who suffer from dust allergies, eczema and asthma. The disruption, dirt, dust, noise and asbestos for 3 or 4 years of development will harm us and our children physically and mentally. Both of our children have additional needs and we have used services from charities based in the vassall centre. The loss of these services, even for a temporary time, will be detrimental to us. The buildings works for 3 / 4 years will disrupt my children's routines and impact their leaning and behaviour.

The 3 story buildings are overbearing and out of character with the local area. We live opposite the vassall centre and we are concerned with the privacy into our homes and gardens from the 3rd floor of these buildings.

We get sunlight into the front of our house and a 3 story building directly opposite us will block the light into our home.

The area is already over crowded and this building project will cause more over crowding. This is a peaceful area and the if the development goes ahead it will cause the area to become busy and dangerous with more traffic.

The lack of parking is already an issue especially because Vassall Park is around the corner. People already park in front of my driveway to use the park and after the development parking is only going to be worse.

The vassall Centre is currently a hub where lots of charities base themselves, having these charities move out will be a detrimental to the local community.

Mahmood Hussain

To all of you,

I strongly and wholeheartedly object to the proposed planning of the Vassall Centre. The proposed 3 storey buildings are overbearing and out of character with the neighbouring streets, which will cause a loss of privacy and overshadowing of neighbouring homes and gardens, resulting in a significant loss of sunlight. The proposed gross overdevelopment will lead to overcrowding, with a lack of adequate parking on site leading to traffic issues and more on-street parking. Furthermore, the proposed pedestrian access between Willow Bed Close and Vassall Centre site raises significant security issues.

In addition, the proposed change of use away from a hub for charities will result in a loss of services for the disabled. The asbestos, noise, dirt, pollution and disruption for the next 3 to 4 years, including 24/7 noise, traffic, and security light pollution to the immediate neighbours, is unacceptable. The proposed development will have a negative impact on the character and heritage of the surrounding area and will result in the loss of green space, which is already at a premium.

Moreover, the proposed development will have a significant impact on the mental health and well-being of local residents. The noise, pollution, and disruption caused by the proposed 24/7 construction work will have a negative impact on the quality of life of those living in the immediate area. Furthermore, the proposed loss of green space, which is essential for mental health and well-being, will have a detrimental impact on the community.

Additionally, the proposed development fails to take into account the needs of the local community and will result in the loss of important services for vulnerable members of the community, such as the elderly and disabled. The lack of adequate parking on site will result in an increase in on-street parking, which will cause additional congestion and safety concerns for pedestrians and drivers alike.

In summary, the proposed planning of the Vassall Centre is deeply flawed and fails to take into account the needs and concerns of the local community. The significant negative impacts of the proposed development, including the loss of privacy, sunlight, security, services for the disabled, green space, and heritage, are simply unacceptable. The planning committee must reconsider this proposal and work with the local community to find a solution that benefits everyone.

Thanks a lot  
Chilok Chin

Dear Planning Committee,

I am writing this statement as a local resident for 50 years, who loves Fishponds and would ask for a good environment for present and future generations. Please can we have a development which enhances the area and where current residents and those moving there can be happy.

My complaints are not regarding the vision for the site but the practicalities in such a small area.

I would have preferred the present occupants to have more, not less, space. The groups are a much needed resource for the disabled of Bristol.

The situation of the 3 Storey buildings here will be overbearing and cause distress for those living close to them.

Parking is a major concern to me and neighbours. Vassall's Park is very close by and the new parking charges cause more cars to park on surrounding roads. The new Centre would need adequate parking, especially as elderly people receive numerous visits from those caring for them, family and professionals. The bus which stopped on Gill Avenue is no longer in operation which would exacerbate the problem. Local residents are increasingly finding the need to turn their front gardens into driveways. Front gardens are good for the environment (even grass helps clean the air) and give pleasure to the community.

Please make this a development we can be proud of and where those living and working there can have a good environment and neighbours can see it as an asset and not an overcrowded blot to ruin their homes and neighbourhood.

Yours faithfully,

Yvonne Swinney



**Vassall Centre Planning Application 22/03476/F**

Vassall Centre, Gill Avenue, Fishponds, BS16 1QQ

**Access to public transport:**

The Planning Officer report about the above scheme states [Para i) Provision of C2 Use]

“Policy DM2 “requires that Older Persons’ Housing Schemes should be located close to shops and services and close to good public transport links.”

And that the

“the location adjacent to shops and facilities of the wider Fishponds area as well as easy car and bus links...”

The Transport Statement [Para H i)] states that

“car ownership [is likely to be] minimal due to the availability of public transport and improved active travel connections to local amenities including Fishponds Road.”

However, on 2 April 2023, First Bus scrapped the 47 bus which used to stop outside the Vassall Centre. This means that

- the nearest bus stop on Fishponds Road is 0.4 miles from the site.
- the main Fishponds Road shops are 0.8 miles away.
- the nearest GP surgery is 0.4 miles away. The other local GP practice is 0.6 miles away.

Without a bus service, many of the Fishponds amenities become inaccessible to people who find it difficult to walk these distances.

The loss of the local bus service already impacts on the quality of life for older and Disabled people in this area. The Development Control Committee should recognise and note this issue.

Lori Streich

Hello, I am writing with reference to;  
Planning Application 22/03476/F  
Vassall Centre, Gill Avenue Fishponds BS16 2QQ.

I am Steven Cottrell.

I wish to request that the planning committee would visit the above mentioned site, to see how close the existing neighbouring houses are to the proposed 3 storey buildings.

This proposal is completely out of character with the existing residential area and will be an eyesore for eternity, in addition, I would raise the following objections;

This proposal will generate noise, dirt and general disruption to the whole area for the next 3-4 years, so in other words all of the children being born in this area will be subject to the above forms of pollution for the whole of their pre school childhood ( and beyond).

In addition to this I believe that there is also a risk of asbestos pollution.

The roads to access the site are nowhere near sufficiently big enough to cope with the the size of vehicles required over this period of time, the only viable access & exit routes are either end of Gill Avenue , i.e. through a narrow one way system near co op, or through a narrow housing estate near a school.

Any privacy that residents currently have, will potentially disappear, also any sunlight.

The proposal does not do enough to show how any existing services, i.e. schools, doctors & dental will cope with a huge additional burden.

The Oldbury Court end of Gill Avenue already has parking issues for residents, this will get even worse as there does not appear to be enough on site parking .

Please bring the planning committee to site to see first hand.

Kind regards

Steve

Planning Application 22/03476/F  
Vassall Centre, Gill Avenue, Fishponds, Bristol BS16 2QQ  
Public Forum Statement  
Kelly Weaver – Local Neighbour

I have previously objected to the plans for the Vassall Centre on two occasions, and a summary of my objections are detailed below:

- Loss of privacy due to the proposal of 3 storey buildings overlooking existing, surrounding 2 storey houses.
- Loss of Light due to above
- Traffic and Parking issues (not enough parking spaces per dwellings proposed). Parking is already extremely bad due to the Oldbury Court Estate car park now charging for parking. Visitors to the area/dog walkers are now parking on surrounding streets to avoid paying.
- Disruption, noise, pollution etc for years to come during the build.

## REGARDING:

Planning Application 22/03476/F

Vassall Centre, Gill Avenue, Fishponds BS16 2QQ

## My objection:

As I commented before: having a 3-storey business-dedicated building overlooking our property means complete lack of privacy and therefore reducing of our living space significantly. Not to mention the loss of sunlight in our and other neighboring gardens and houses. Also the whole project is rather huge, which means a lot of disruption like: noise, dirt, pollution, road traffic etc. around the building site, which means directly behind our garden, for the period of a couple of years! Going ahead with such plan will mean more disturbances for distant future as well like: overcrowding this not big enough space, lack of adequate parking spaces, road traffic on all surrounding roads etc. I'm also very much concerned about losing this space for all charities providing important services to Bristol people; I know many of them will have real issues with relocating their offices. This is a very unique site in Bristol at the moment and destroying it would be a real loss; I can't see any significant improvements for the local community when the rebuilding plans go ahead.

Kind regards,

Bernadeta Starzak

Public Forum Statement  
Planning Application 22/03476/F  
Vassall Centre, Gill Avenue, Fishponds, Bristol BS16 2QQ

Local Neighbour  
Nadine Amos

On numerous occasions I have objected the planning application for the following reasons:

1. My privacy will be lost due to a 3 storey building being built directly in front of my property
2. My light will be affected due to above
3. All other surrounding buildings are only 2 storey and therefore this is not in keeping with surroundings
4. Traffic and Parking issues (not enough parking spaces per dwellings proposed). Parking is already extremely bad due to the Oldbury Court Estate car park now charging for parking. Visitors to the area/dog walkers are now parking on surrounding streets to avoid paying
5. Disruption, noise, pollution during the build, which could last years

Planning Application 22/03476/F

Vassall Centre, Gill Avenue, Fishponds, Bristol BS16 2QQ

Local Neighbour

Craig Amos

On numerous occasions I have objected the planning application for the following reasons:

1. My privacy will be lost due to a 3 storey building being built directly in front of my property
2. My light will be affected due to above
3. All other surrounding buildings are only 2 storey and therefore this is not in keeping with surroundings
4. Traffic and Parking issues (not enough parking spaces per dwellings proposed). Parking is already extremely bad due to the Oldbury Court Estate car park now charging for parking. Visitors to the area/dog walkers are now parking on surrounding streets to avoid paying
5. Disruption, noise, pollution during the build, which could last years

Planning Application No. 22/03476/F, The Vassall Centre, Gil Avenue, BS16 2QQ  
 From: Elena Cross,  
 (Member of the Vassall Centre Neighbours Group ) We have requested to speak  
 consecutively and will each address a separate material objection

The Vassall Centre is a single storey, non-residential building nestled in a quiet residential area of 2-storey houses with pitched roofs (7-7.5m in height). The proposed development would consist of six 3-storey blocks (10-12m tall + roof plant) built on northward sloping ground, with five of them joined together. The Housing for Older People would be 3.1m away from the pavement on Vassall Road; The Hub office block would be 19.19m away from the immediate neighbours' gardens in Little Hayes and at 18 Willow Bed Close. These houses were built in the 90s and are representative of all of the nearest houses to the north and east of the Centre.

The Hub would tower over all of its immediate neighbours in the north, my home included, making us feel bricked in and cut off from the rest of our Fishponds area. We would be facing 12m high walls, office windows and service entrances in the south. The proposed central landscaped area would be hidden from our view, unlike the proposed main car park of the development positioned right next to our fences. Page 867 of your Agenda Document (Public Pack) perfectly illustrates all of the above points. Page 822, however, contains an inaccurate site map as it does not include the north access lane of the current Vassall Centre. Page 868 is showing the ground floor plan before the February revision. Page 833 (Impact on Privacy) states that "The nearest point of the proposed buildings is around 14 metres from the side Boundary at No.82 Vassall Road and No.19 Willow Bed Close." It should be 18 Willow Bed Close and around 20 metres (side passage included).

In view of all of the above, it is my opinion that the proposal of such height, massing and positioning constitutes an overbearing overdevelopment completely out of character with the surrounding area which would be harmful to the visual amenity of the neighbouring homes. I believe that the entire proposed development contravenes Policy DM26 (Local Character and Distinctiveness) and Policy BCS21 (Quality Urban Design).

I would also like to draw your attention to the Planning Officer's comments on the refused Prior Approval Application for the "Telecoms mast outside the Vassall Centre Gill Avenue Bristol BS16 2QQ" (22/05158/Y):

"The proposal would be large and would fail to be in-keeping with the material palette and design of the local area"

"The scale of the proposed telecommunications equipment would be disproportionate when compared with other built structures in the surrounding area and would subsequently appear incongruous"

For all of these reasons, I would like to respectfully request the deferral of the Planning Committee's decision pending: a more thorough representation of the 89 residents' objections in the Report; review of the listed discrepancies; and a site visit to witness in person the detrimental impact such layout, height and massing would have on the neighbouring homes, especially those along the north perimeter.



Please find below my statement for the above Planning Committee. I will be attending the meeting and wish to speak as I believe you have already been informed.

Planning Reference: 22/03476/F

Nina Gerrard,

Member of the Vassall Centre Neighbours Group.

We have requested to speak consecutively and will each address a separate material objection.

I would like to draw your attention to the major concerns I have with the height of the proposed buildings and to point out some points of information from the Planning Officer's Report. There are no 4 storey buildings in the immediate vicinity, the nearest being half a mile away, and the 3-storey buildings are further down Gill Avenue.

- I would point you to Policies BCS21 and DM26, which say 'development will not be permitted where it would be harmful to local character and distinctiveness'.
- British Telecoms Mast, Application No. 22/05158 was refused for being 'disproportionate and within direct view of residents, highly visible and prominent in the surrounding area. This would not respect the open character of the existing public realm and would be discordant within the wider street scene'.
- A 56.67 metre 3-storey block across the back of my, and neighbours, houses would make it highly visible and not respectful of the existing public realm. The privacy of all living in the surrounding area would be significantly impaired with the proposed Hub having windows all the way round. The land falls away considerably from the Vassall Centre meaning buildings will be higher at the North end of the site.
- The roofs of the current single storey buildings are in line with the windowsills on our first floors which will give you an indication of the impact of 3-storey buildings.
- The sun study plans demonstrate that the proposals do not prohibit the surrounding gardens from receiving at least 2 hours of direct sunlight on 21st March. Those of us in Little Hayes and Willow Bed Close, whose homes back on to, and are on the boundary of the Vassall Centre, have south facing gardens receiving sunlight all day long. The proposed Hub will be at least twice the height of our homes and will, therefore block a huge amount of sunlight.
- There is a point of information with the discrepancy in the distance from my house elevation (30 metres to the Hub) and the distance from my fence (19metres to the Hub) which do not correspond.

- The report also says, 'given the width of the road and separation distances from adjacent developments proposed height of the proposed development is considered acceptable.' There is no road between the north end of the Centre and the houses in Little Hayes and Willow Bed Close, just a narrow lane.
- Residents of both Little Hayes and Willow Bed Close have been continually omitted in terms of the proposed development. Our houses were built on the boundary and are, without doubt, the nearest neighbours of the Vassall Centre and the most adversely affected by the proposed development.

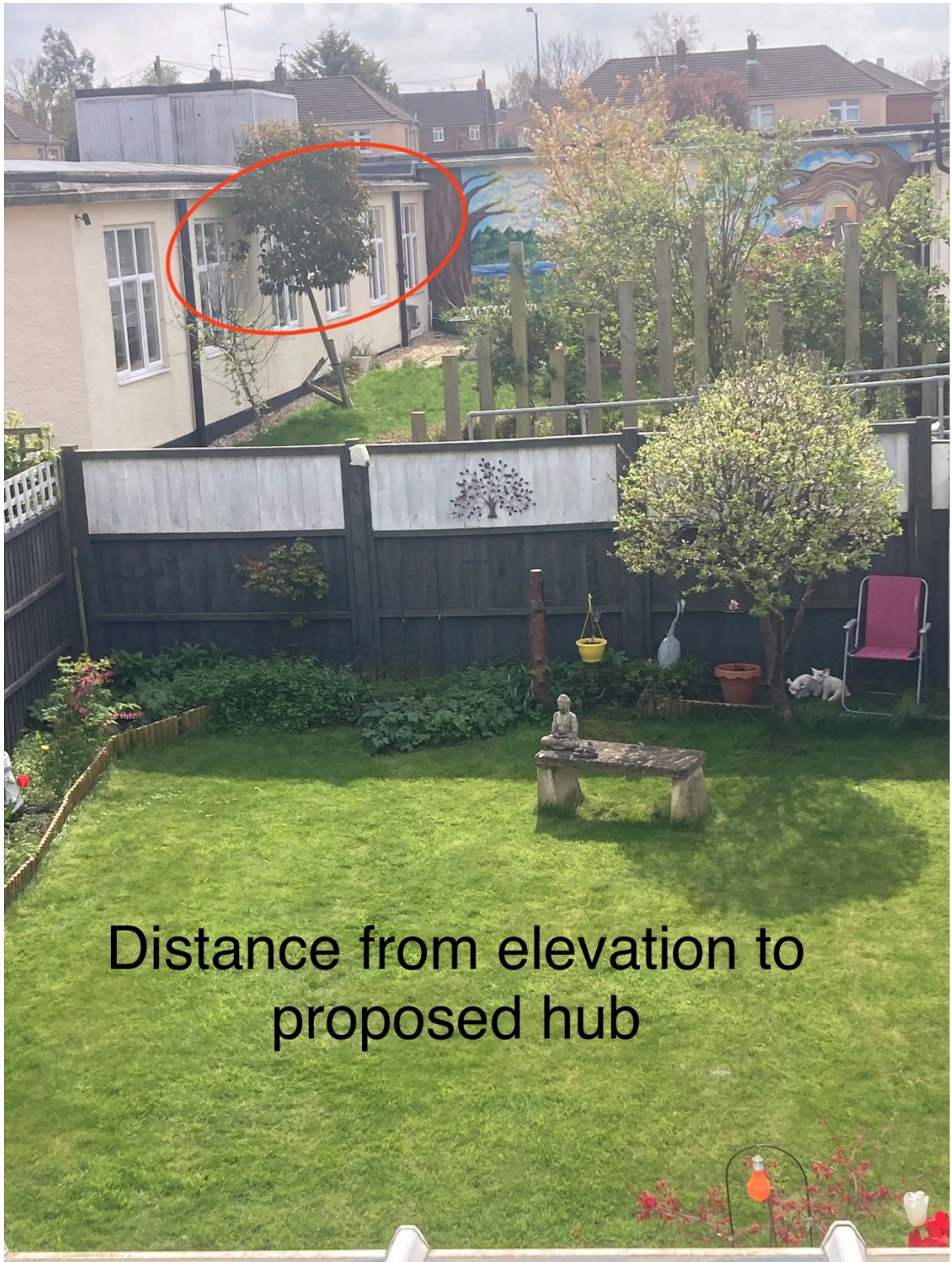
I would like to respectfully request a deferral of the Planning Committee decision pending:

- Address discrepancies of the Report
- Fuller representation in the Report of residents' concerns
- Planning Committee site visit to view, in person, the devastating impact on neighbouring properties, especially those along the North perimeter, of 3-storey massing

Nina Gerrard











Statement:

May I draw attention to the gradient of the land on which the Vassall Centre, Little Hayes and Willow Bed Close are located (illustrated on p867 in the Public Pages), with the Vassall Centre built on the higher ground.

The gradient is clearly visible to the naked eye throughout the site, and also demonstrated by:

- steps both within, and to ground level from the rear of the Vassall Centre building
- the step down from lawn to patio, and front door to pavement level at No's 20-23 Little Hayes
- 'stepping' of houses in Little Hayes and Vassall Road

The Report draws attention to the windowless side elevations facing the Vassall Centre on the North border of 82 Vassall Road and 18 Willow Bed Close.

The Report omits No's 20-23 Little Hayes, whose currently private and sunlit south facing living accommodation (lounges/bedrooms/back gardens) directly face the planned 3 storey 10/12 metre massing.

These homes would experience exacerbated effects of 24/7 overlooking, overshadowing etc. caused in particular by the gradient of the land and 24/7 nature of residential accommodation.

I would welcome meaningful dialogue and compromise from Bristol Charities, who from the outset have been immutably fixed on placing 10/12 metre buildings around the perimeter of the site.

Meanwhile, I would like to respectfully request deferral of the Planning Committee decision pending:

- fuller representation in the Report of residents concerns
- addressing of discrepancies in the Report as cited in this and other Statements
- Planning Committee site visit to view in person the devastating impact of 3 storey massing on homes on the North border and on the neighborhood.

Lois Dyer

End

Karen Francis - Willow Bed Close 22/03476/F - Vassall Statement - Public Forum Statement

Vassalls is occupied predominantly Monday-Friday 0900-1700 as office space. Noise levels are extremely low, and associated disturbance is very rarely noted.

**I would like to raise an objection to the planning application submitted on the following grounds:**

- Passage into WBC from Vassalls site will cause increased foot traffic through a residential area and associated nuisance. This is a particular concern given requested opening times for commercial operation until 2300. This is a private boundary and should remain as such. (Vassall Centre - Design and Access Statement - Page 16)
- Change of use to increase use of site for commercial purposes and associated noise and traffic (both pedestrian and vehicular) during stated allowed times of operation. The local area is primarily residential, and while weekday commercial activities between 0800-2000 might be reasonable, the hours of operation for weekends are a concern and seem excessive. Reducing these hours will safeguard the residential amenity of nearby occupiers. (Section 56,57,60, page 854)
- All building works and ancillary operations carried out between 0800-1800 Monday to Friday is reasonable, however 0800-1300 on Saturday is outside the current on site normal operations and noise disturbance levels and would not maintain good public relations. (Section 3, page 839)
- General concern about proposed parking on the northern boundary which is now stated as the main entrance to site. Anticipated traffic will be higher than it has been, given the proposed increase in commercial and residential capacity. Noted, that with the proposed one way system around site, this will be an acceleration zone with associated noise
  1. Disturbance caused by increased in traffic to site, because of change of use to residential (Care Home):
    - a. Employee traffic
    - b. Visitor traffic
  2. Disturbance caused by increased in traffic to site, because increased office occupancy
    - a. Office occupants traffic
    - b. Visitor traffic
- Services and bin stores being on the northern edge of the building will require access for heavy vehicles(e.g refuse collection vehicles) this introduces increased noise to residents of the northern boundary. Similarly plant equipment leads to persistent noise introduced to an otherwise extremely quiet environment. (Reference - 4469-AWW-02-00-DR-A-02220-P06 GROUND FLOOR PLAN)
- Anticipated lighting of the car park, likely security lighting, and light from residential and commercial buildings being intrusive to the neighbors. These additional sources of light are expected to be a nuisance to neighbors, particularly those on the northern boundary where the southern aspects are not currently directly exposed to these types of light source. Request to control the times of operation, and the colour (e.g. red which is known to be lower for light pollution) (Section 5, page 840-841)

In summary I would respectfully request the Planning application be declined and the following to occur -

- Fuller representation of the concerns raised by objections - most objections are about the height and density of the application as it is out of character for the area and will be overbearing
- Address discrepancies in the report
- Site visit to oversee the impact of the development and the lack of facilities in the area (e.g. bus route).

On the 'Committee Report Development Control Committee A – 26 April 2023' dated 19th April 2023, the report is compiled based on the list of approved plans in section 61, it is noted that there are later versions of some of these documents (material changes unassessed) can the council clarify which reference documents the planning application decision be made on? Can you confirm the Officers report will be updated ?

Planning Application No. 22/03476/F, The Vassall Centre, Gill Avenue, BS16 2QQ  
Murray Cross, (Vassall Centre Neighbours Group)

We have requested to speak consecutively and will each address a separate objection

I would like to draw your attention to the fact that a 5 fold increase in indoor floor space in the proposed development (Phase 1) is accompanied by around 50% reduction in the number of car parking spaces currently available to the users of the Vassall Centre.

There are 3 reasons why there is an underestimation of the amount of car parking needed:

1. Currently there are 92 car parking spaces at the Vassall Centre. Only 30 places, however, have been allocated in the proposed plan for the Hub. The number 30 is based on a 1 day analysis of the current parking usage (on the 23rd June 2022 - a COVID era, dry and sunny summer day) and some optimistic assumptions that Hub users will find some alternative means of transport. The 23rd June 2022 was not a typical day, with people being on holiday, working from home, being ill with covid, a higher than normal number of people cycling/walking due to the good weather, etc. The recommended number for the proposed office space would be 44. Note the figure of 44 is for average office, not fully accessible office space, where a higher than average car usage is expected. On top of this, from my personal pre-COVID experience as a close neighbour, regular overflow of the 92 car spaces is normal. Indeed, there is specific evidence to counter the claim that 30 parking spaces is enough. 105 cars were counted by an immediate neighbour on 10th November 2022 at 11:40am (including overflow on adjacent roads) and later in the afternoon there were still over 52 cars parked. On 24th August 2022 (school holidays) over 50 cars were counted. 72 cars were shown on Google Earth at the moment of writing.
2. HFOP was allocated only 6 spaces in the August 2022 proposal. There is an assumption that 'Residents do not typically have their cars on site'. Please note that the plans should not take into account today's situation, but also future predicted growth in personal mobility (mobility scooters and self driving cars). Surely this planning proposal cannot assume a complete lack of vehicles in future years for around 40 housing units proposed.
3. The transport statement makes strong emphasis of the close bus route just outside the Vassall Centre and how this reduces the need for car parking spaces. This aspect should be reevaluated as the bus service to the adjacent bus stop (no. 5 and then 47) has been cancelled. This leaves the distance to the nearest regular bus route well outside the CIHT recommended maximum walk distance of 300m.

If the new reduced number of car parking spaces is agreed (only 48 in the revised February 2023 plan), users of the new estate would look to park elsewhere. With the proposed pedestrian passage to Willow Bed Close (Design and Access Statement 1 of 2, p16. North Boundary, point 7), our street would become a convenient overflow car park to the detriment of the existing residents. Other neighbouring streets would also suffer as parking is already an issue exacerbated by the proximity to the Oldbury Court Estate Park.

I would, therefore, respectfully ask that the Planning Committee Decision is deferred until a visit of the site and all four neighbouring roads is undertaken, information in the planning documentation revised and the overspill parking concerns of the local residents addressed.





Please find below my statement for the above Planning Committee. I will be attending the meeting and wish to speak as I believe you have already been informed.

Application 22/03476/F

Michael Curtis

I am a member of Vassall Neighbours Group

I am a retired Home Office trained Crime Prevention Officer.

- I thought this application, "Class C2 residential homes for the elderly," would be residential and therefore covered by part Q of the building regs of 2010, which sets out the security standard of windows and doors (pass 24). I was pleased that Bristol Charities was going to apply for secure by design but very disappointed that they failed to do so.
- I understand some, possibly most, of the buildings are being built with prefabricated units. I am concerned that these may not meet the security standards required. I realise, despite the impression "Class 2 residential" gives, this may be a commercial building and that residential building regulations would not apply.
- I would like to be assured that the specification of these units will meet British Security Standards Pass 24 on windows and doors. They will be housing the elderly and most vulnerable people in our society. It would be wrong to disadvantage them by not providing the same level of security as a new homeowner would expect.
- I also have concerns that the elderly residents will become isolated especially as they may be leaving support behind when they move from another area. This area may be unfamiliar to them. No public transport exists on this route, and visitors will be discouraged from using a vehicle as parking on the site or residential street will be severely limited.
- The site will be boxed in by large 3 storey blocks all around its perimeter. At night there will be little or no active surveillance of the open spaces, other than from elderly residents. The local policing team has, as one of their priorities, drug dealing and anti-social behaviour on Gill Avenue. Anti-social behaviour already exists in the area and could easily move to the more hidden areas of the proposed site causing anxiety for the elderly who already have a heightened fear of crime.
- Developers always like to show their development in good light but at night a different picture will emerge. The Crime Prevention Officer mentioned that no management plan had been submitted, and it would be vital to address any issues on site.

- A new footpath has been included in the plan that leads through the site, to Willow Bed Close. There is no good reason for this to be built. The residents don't want or need it, and it would likely become an area where crime could be exported from the Vassall Centre to the quiet neighbouring streets. The developer has not been able to supply any compelling reason as to why it's required, (Design and Access Statement 1 of 2. Page 16, North Boundary)
- Bristol City Council's Affordable Housing Practice Note (April 2018) states the applicant 'should achieve SBD certification, wherever possible'.

Why is this not possible?

- Looking at previous homes for the elderly built by Orchard homes (owned by Bristol Charities), they are located by retail areas, and are not surrounded by domestic residential homes. Their scale and industrial look/design is completely alien to our area.

I ask you to reject this application. If you have any doubt, then I do believe a site visit by you all will clearly show that this application is out of context and harmful to the surrounding residents wellbeing.

Mike Curtis

Dear Planning Committee Members,

My partner (Diana Wright) and I have made representation to you on two occasions before today. We live together in a house close by the proposed development site, some 100 metres or so away. We have already set out our objections to both the original and the revised proposals for the developments of the Vassalls Centre site.

I understand that you have only seen a summary of the total number of objections made against the proposals.

For your benefit, I now repeat those objections with an additional plea to all of you.

The objections are like so:

- 1) The proposed 3-storey buildings will dominate the 2-story residential buildings near to the site, and will be out of sympathy in size and colour to the surrounding area.
- 2) The height of the proposed buildings will restrict daylight to many surrounding properties, especially in winter.
- 3) Surrounding properties will be easily overlooked by the residents of the 3 storey buildings proposed in the plan, resulting in invasions of privacy.
- 4) There is a real risk of there being car parking congestion in the streets adjoining the new site, due to inadequate car parking proposed within the new site. These same streets are already experiencing an increase in car parking from those using the Vassalls Park for recreation and choosing not to pay the recently imposed car parking fees in the Park. This, of course, is particularly problematic at weekends and summer evenings.

We strongly urge you to reject the current proposals and consider:  
 either that you request a new plan with the 3-storey buildings placed at the centre of the site (and away from existing surrounding residential properties )  
 or that the proposed buildings are reduced to 2 storeys only.

We also strongly urge that all of you visit the site and see for yourselves the impact that the proposed plans will have on the local residents.

We are also concerned about the impact on the nearby residents of the building process over the next several months and years in terms of noise, building site traffic and security light pollution.

And finally, we are disappointed that the site will no longer be an important hub for the various charities presently there, who do invaluable work for the vulnerable members of the local and City community.

With best wishes,

Martin Phillips and Diana Wright,

BS16 2LD

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Hello Planning Committee

I am submitting a Public Forum Statement in relation to Planning Application 22/03476/F

Vassall Centre, Gill Ave, Fishponds BS16 2QQ

From Katie Wiltshier

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I live in Little Hayes which is adjacent to the Vassal Centre and wish to lodge my objection due to significant concerns regarding the planning application for proposed redevelopment of the site. My concerns are related to the following - The proposed three storey buildings will overlook existing homes in Little Hayes and Willow Bed Close which will impact on privacy; also the buildings will overshadow the neighbouring properties in the winter when the sun is low.

Given that the current properties are all 2 storey the 3 storey buildings will be out of character with the existing houses and be overbearing for those living the other side of the fence from the new development

I am also concerned about the number of parking spaces in the new proposal in relation to the number of tenants. There has already been a significant increase in cars parked on Vassal Road, Little Hayes and surrounding roads following car park charges being brought in at Oldbury Court Estate. I am

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concerned that people will start parking dangerously and blocking roads for emergency vehicle access if they cannot find somewhere to park legally.

Although there have been some revisions published of the original plans, none of them take these concerns- which I know are shared by other homeowners in Little Hayes and Willow Bed Close. To my knowledge there has not been a site visit which would seem essential to making a decision about a development that will - in its current form - directly impact the privacy of homes adjacent to the Vassal Centre.

Many thanks for taking my concerns seriously.

Katie Wiltshier

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FAO planning committee:

I would like to submit this statement objecting to the planning application 22/03476/F Vassall Centre, Gill Avenue, Fishponds BS16 2QQ. The main objections are as follows:

- the overbearing nature of the 3 storey buildings planned at the edge of the development
- the development is out of character with the neighbouring streets
- change of use away from a hub for charities, and the loss of services for the disabled
- lack of adequate parking provided on site, leading to traffic issues and more on street parking issues
- security light pollution to immediate neighbours.

Simon Dunk



Hello,

30

This is in regards to planning application: 22/03476/F. Vassall Centre, Gill Avenue, Fishponds BS16 2QQ.

I have seen the current plan for development, and although buildings are relatively pleasing to the eye i object to them been built so close to the edge of the site boundary. The current vassall buildings are set back from the site boundary, if the new buildings were set back on the similar footprint i feel they would not be so imposing to the neighbours. The current footprint would make the area feel overcrowded, overshadowed, added light pollution and loss of privacy.

Additionally have you considered how the additional residential cars and heavy traffic during development would effect road safety and current neighbours car parking requirements??

I live at 79 Vassall rd with young children and it's already a battle to try get a parking space close to the house. (Especially during holiday times when visitors to Oldbury Court park on our streets).

Please consider this.

It would be great if the whole planning committee could visit the site for themselves (as with any application) to understand the imposing effects to the neighbours of the proposed buildings and the related traffic.

In addition i don't understand why a nursery has not been considered when there is going to be a high demand for nursery's with the governments new funding scheme over the next couple of years. They have delayed the scheme to help new nursery's open and others catch up as they foresee the high demand. I feel your current reasoning of '...putting a strain on local nursery's...' is rather an excuse not to pursue with it. What are your real intentions? Communities need strengthening and confidence in developments, especially those being directly built within a residential area.

I hope for a positive response,

Kind Regards,

Sophie Frith

**26/4/2023** Tanya Thomas

I have lived adjacent to the Vassall Centre (VC) for over 20 years. I have read the case officer report and have found several inaccurate pieces of information I believe are material to making a fair and informed decision about the development. I will try to use my short statement to highlight some main issues, however I feel it would be better to defer a decision on these plans until more accurate information can be put before the committee. As the report does not correctly represent the site's situation/surroundings, I would also like to request if it is possible for committee members to visit the site prior to making a decision so that they can see the detrimental impact it will have on existing homes bordering the site and the amenity for the community. Many of these points were covered fully in objections, and so I also think it would be beneficial for members to be shown the objections in addition to these shorter statements (as per Bristol Zoo case).

I therefore request that the decision is deferred pending (a) corrections to the report so that a decision is based on facts, (b) a site visit, and (c) circulation of objections. I understand that the site will need to be developed at some stage but it could be done in a way that serves the community and is also much more sympathetic to the surrounding area. The current design is focused on 3 storey, high mass buildings which are not in keeping with the mostly 2 storey area. Their positioning around the perimeter will also cause unreasonable levels of privacy invasion, overshadowing, noise, overlooking, parking & other issues.

- Characterisation of the site surroundings is incorrect: "The proposed scale mass and design is considered inkeeping with the character and appearance of the wider area" and "site is in a predominantly residential area surrounded by 2 storey semi-detached housing interspersed with other building typologies including some 3 and 4 storey apartments". These statements are misleading and should not be used to inform a decision. In fact the site is surrounded/directly bordered by 2 storey houses. The North of the site is not mentioned but is entirely directly bordered by properties in Little Hayes and Willow Bed Close. The east is bordered by 2 storey houses (not 3 storeys; a few can be found further down Gill Ave and set back from the road). There are also zero 4 storeys surrounding the site. The proposed development is not in keeping with the area and will harm its character, in contravention of BCS21 principles. At least 50% of the site is bordered by house types/designs that have not been considered in the applicant's plans.
- "Given the width of the road and separation distances from adjacent developments the proposed height of the proposed development is considered acceptable". The fact is there is no road separating the buildings from properties in Little Hayes and Willow Bed Close; these properties directly border the VC site. Houses in Vassall Road are also very close to the proposed 3 storey buildings.
- The location plan on page 822 does not accurately depict the full scope of development. The VC land to be developed goes right up to the property fence lines bordering it at the rear of the site (beyond the pink shaded area), ie, much closer to residential properties than is highlighted. Section G(i) only mentions bordering houses with side elevations. In fact there are houses in Little Hayes whose rear of the property (living space & bedrooms) face the proposed 3 storeys, causing significant privacy, overlooking and overshadowing issues that are very unreasonable for homes that have not previously had such issues. They are entitled to expect ongoing privacy & sunlight access going forward. Note that the land also slopes down significantly from site front to rear; exacerbating these issues.
- Parking and public transport. Section H(iii) evidences the applicant's car parking survey which was proven not to be representative of the VC parking demand. It was conducted on 1 day in June when they counted 27 cars. I conducted a count in November of 105 cars parked at 11:40 (with extra parking also spilling out onto adjacent roads) and 52 parked cars at 14:35. I have supporting photos. On the day I objected in Aug I counted 50+ cars. The reality is that this car park often exceeds its current 110 spaces and the 'survey' is being used to justify an inadequate number of 49 spaces (whilst also increasing internal building capacity from 1377 to 6925 square metres). In addition, the report quotes "proximity of local bus stops within 200m of the site access make this site a wholly sustainable option" and "it is located on a main bus route into and out of the city centre". This is untrue. The bus routes close to the site were all cancelled. The nearest bus stop is now up on the main Fishponds Rd; some 550m and a good 10 minute walk away. This will increase car use and parking demand. This is a quiet residential area, already struggling with lack of, and inconsiderate, parking (recently worsened by the introduction of parking charges at the nearby Oldbury Court Estate). It will further these issues and may cause traffic safety issues.

## **Statement of objection - Vassall Centre 22/03476/F - Development Control Committee A 26/4/2023**

Tanya Thomas, 13 Willow Bed Close, Bristol BS16 2WB

I have lived adjacent to the Vassall Centre (VC) for over 20 years. I have read the case officer report and have found several inaccurate pieces of information I believe are material to making a fair and informed decision about the development. I will try to use my short statement to highlight some main issues, however I feel it would be better to defer a decision on these plans until more accurate information can be put before the committee. As the report does not correctly represent the site's situation/surroundings, I would also like to request if it is possible for committee members to visit the site prior to making a decision so that they can see the detrimental impact it will have on existing homes bordering the site and the amenity for the community. Many of these points were covered fully in objections, and so I also think it would be beneficial for members to be shown the objections in addition to these shorter statements (as per Bristol Zoo case).

I therefore request that the decision is deferred pending (a) corrections to the report so that a decision is based on facts, (b) a site visit, and (c) circulation of objections. I understand that the site will need to be developed at some stage but it could be done in a way that serves the community and is also much more sympathetic to the surrounding area. The current design is focused on 3 storey, high mass buildings which are not in keeping with the mostly 2 storey area. Their positioning around the perimeter will also cause unreasonable levels of privacy invasion, overshadowing, noise, overlooking, parking & other issues.

- Characterisation of the site surroundings is incorrect: "The proposed scale mass and design is considered inkeeping with the character and appearance of the wider area" and "site is in a predominantly residential area surrounded by 2 storey semi-detached housing interspersed with other building typologies including some 3 and 4 storey apartments". These statements are misleading and should not be used to inform a decision. In fact the site is surrounded/directly bordered by 2 storey houses. The North of the site is not mentioned but is entirely directly bordered by properties in Little Hayes and Willow Bed Close. The east is bordered by 2 storey houses (not 3 storeys; a few can be found further down Gill Ave and set back from the road). There are also zero 4 storeys surrounding the site. The proposed development is not in keeping with the area and will harm its character, in contravention of BCS21 principles. At least 50% of the site is bordered by house types/designs that have not been considered in the applicant's plans.
- "Given the width of the road and separation distances from adjacent developments the proposed height of the proposed development is considered acceptable". The fact is there is no road separating the buildings from properties in Little Hayes and Willow Bed Close; these properties directly border the VC site. Houses in Vassall Road are also very close to the proposed 3 storey buildings.
- The location plan on page 822 does not accurately depict the full scope of development. The VC land to be developed goes right up to the property fence lines bordering it at the rear of the site (beyond the pink shaded area), ie, much closer to residential properties than is highlighted. Section G(i) only mentions bordering houses with side elevations. In fact there are houses in Little Hayes whose rear of the property (living space & bedrooms) face the proposed 3 storeys, causing significant privacy, overlooking and overshadowing issues that are very unreasonable for homes that have not previously had such issues. They are entitled to expect ongoing privacy & sunlight access going forward. Note that the land also slopes down significantly from site front to rear; exacerbating these issues.
- Parking and public transport. Section H(iii) evidences the applicant's car parking survey which was proven not to be representative of the VC parking demand. It was conducted on 1 day in June when they counted 27 cars. I conducted a count in November of 105 cars parked at 11:40 (with extra parking also spilling out onto adjacent roads) and 52 parked cars at 14:35. I have supporting photos. On the day I objected in Aug I counted 50+ cars. The reality is that this car park often exceeds its current 110 spaces and the 'survey' is being used to justify an inadequate number of 49 spaces (whilst also increasing internal building capacity from 1377 to 6925 square metres). In addition, the report quotes "proximity of local bus stops within 200m of the site access make this site a wholly sustainable option" and "it is located on a main bus route into and out of the city centre". This is untrue. The bus routes close to the site were all cancelled. The nearest bus stop is now up on the main Fishponds Rd; some 550m and a good 10 minute walk away. This will increase car use and parking demand. This is a quiet residential area, already struggling with lack of, and inconsiderate, parking (recently worsened by the introduction of parking charges at the nearby Oldbury Court Estate). It will further these issues and may cause traffic safety issues.

## Public Forum

## Statement

Planning Application No. [22/03476/F](#), The Vassall Centre, Gill Avenue, Bristol, BS16 2QQ

I have lived in Willow Bed Close all of my life and my bedroom window overlooks the back of the Vassall Centre. It is a single storey building which does not restrict my view of our wider Fishponds neighbourhood. A three storey office block would visually cut me off from the entire area and would not be a pleasant sight to look at. Furthermore, a building that tall and on higher ground would cast a shadow over my window ( some distance away from the boundary) in the winter, affecting my mood and mental health. My sleep would also be disturbed by the security lights from the main car park next to the boundary; and the night time safety and security of our close would be compromised by the proposed creation of a passage to the new open estate.

I would, therefore, like to ask the Planning Committee to reject this application in its current form and instruct the investors to devise a proposal that would be in harmony with our neighbourhood, instead of the one that forces us to move away and destroys our community. Please make a visit to the site to see the impact this proposed overdevelopment would have on all of us living next to the Vassall Centre.

Edwin Cross

Stephen Thomas

I live immediately behind the Vassall Centre (VC), and have for over 20 years. I am submitting a statement of objection as the plans will be hugely detrimental for residents living around the site (for many reasons including overlooking and overbearing to existing neighbours, high density, insufficient parking provision, loss of light, increased noise). I would also like to bring attention to the fact the public document pack contains some inaccuracies that I feel should be addressed so that committee members can have complete and accurate information. I ask that the planning decision is deferred to enable this to happen. I also ask that committee members are given the opportunity to visit the site to appreciate the impact it will have on the surrounding neighbourhood, and see how out of keeping it will be.

Parking – parking is already a problem in the local area, partly contributed to by the existing VC capacity. Adding to the density of the site and reducing the parking provision will only make this worse. The report cites the applicant's parking survey to justify the proposed parking provision which was conducted on 1 day of the year, in June. This survey is biased and unrepresentative. Local residents have conducted parking surveys that demonstrate this is under reporting existing car park usage. I am sure any discussion with local residents would also reveal how much of a problem parking can be in the local area, and therefore how much the parking issue appears to have been downplayed in the proposal. Further to this, the planned pedestrian access from the site into Willow Bed Close should be denied as it will worsen parking issues there.

Not in keeping with the neighbouring area - the report states that the proposed development is considered in keeping with the character of the houses in the neighbourhood surrounding VC and that the neighbourhood already has 3 and 4 storey properties. The neighbourhood immediately surrounding VC is all 2 storey, as is the overwhelming majority of the wider area. The 4 storey properties, being used as part justification for 3 storey proposals, are a 10 minute walk away from VC, nowhere near visible from it. Conversely, properties in neighbouring Little Hayes and Willow Bed Close (which are within 30 metres of VC, and are adjacent to it) have been largely omitted from the impact analysis of the development (report makes 1 reference to them, despite these roads being the closest neighbour to VC site, as they run alongside it).

Loss of light and privacy – the proposed development will lead to a significant loss of light and privacy to those in the immediate surrounding neighbourhood due to its density, scale and proximity. The sun study referenced in the report (based on 1 day in March) is unrepresentative of the full, detrimental impact it will have on nearby properties. For example, properties along the northern perimeter that have always had virtually unimpeded sunlight throughout the year will be severely affected. The report states that there are no unacceptable overlooking issues, citing 2 houses with blank side elevations (82 Vassall Rd and 19 Willow Bed Close). The report omits probably the 4 most affected properties which border the site and will suffer severe overlooking (20-23 Little Hayes which are situated between 82 Vassall Road and 19 Willow Bed Close).

Change of Use – this site is situated in a quiet, suburban, residential area, and VC is currently mainly only occupied weekdays in office hours. The plans include many changes of use of the site, which will lead to overcrowding, utilisation of the site 24/7, parking issues, hugely increased noise, night light pollution etc. The plans should be scaled back to be more sensitive to the neighbourhood and wellbeing of its residents.

Crime concerns – The Crime Prevention Design Advisor raised concerns over lack of natural surveillance from active rooms for the rear car park running against the fence line of existing properties; making it vulnerable to crime and antisocial behaviour. The report does not acknowledge this specific concern; only mentioning the site more generally. Nothing has been done to reduce this risk (it is not a lighting issue).

Phases 1 & 2 – applicant's perceived benefits of phase 2 have been included in the report, linked to phase 1. I feel that either (i) phase 2 references should be removed from the report or (ii) the application should include both phase 1 and 2 together.

Objections not being given due hearing – the summary of objections included in the report does not represent the breadth and depth of the reasons for the objection. It feels that throughout the process, local residents' concerns have not been duly considered. Also, having referred to the 800+ page public document pack, it is notable that objections have been included for the Bristol Zoo application in Clifton but not for the Vassall Centre application in Fishponds.

Public statement.

Vassal centre Fishponds Bristol.

Whilst we welcome the new housing Development for older people and housing and homes for people with learning difficulties.

The provision of a community hub

We have concerns about the need to make the pavements around the community and the vassal centre Fishponds Bristol fully accessible.

With drop Kerbs and castle Kerbs.

To the near no longer in use Bus stops

But as Bristol disability equalities forum are very concerned about the lack of public transport to the vassal centre Fishponds, Bristol.

With the bus service cuts by the west of England mayoral combined transport Authority Mayor Dan Norris. Due to the freezing of the transport levy by Bristol city council Banes and South

Gloucestershire council mean that bus service 47 / 5 bus service has been withdrawn from 47 Yate bus station westerleight puckchurch Emerson green Downend oidbury court Fishponds road Eastville park st werburges st Paul's Bristol city centre

Service 5 Downend oidbury court Fishponds, Broomhill, Stapleton, Eastville park St werburges, st Paul's, Bristol city centre.

Both bus service have been withdrawn.

And no westlink Demand responsive bus service has been provided.

With the need for equalities impact assessments for a development the is being provided for vulnerable people and people with disabilities.

A public transport bus service is essential a financial contribution should be sort as part of a green travel plan

To be passed to the west of England mayoral combined transport Authority mayor Dan Norris to reinstate a public bus service under contract to that Authority to Fishponds town centre

Eastville Eastgate centre. Bristol city centre and Downend.

The Board of Bristol disability equalities forum would welcome the regeneration of the vassal centre Fishponds, Bristol as a housing Development for older people and people with disabilities and a community hub

But at present the site is not on any public transport bus route or community transport service.

The shops and facilities in Fishponds are to far to walk even for basic food shopping at the main supermarkets

Visit to the library or health facilities.

There is also no public transport to Downend, Staple hill or Emerson green

District centre in the area .

Residents could not even visit oidbury court estate a large destination parks .

For residents and Tourists.

We would like this area full addressed as planning conditions as part of a green travel plan and a contribution to a bus service to mayor Dan Norris and the west of England mayoral combined transport Authority.

If public transport can not be provided the application should be refused

As per the local city plan .

Gordon Richardson Bristol disability equalities forum.

David Redgewell South west transport Network

Bristol disability equalities forum trustee.

South Gloucester disabled equalities Network

Ian Beckey Gloucestershire catch the bus campaign.

Dear Planning Committee,

With reference to the above planning application, the revised plan for this site has made only minor changes that do not address the concerns of the community, among which are:

- the complete overdevelopment of the site with three-storey buildings that will be out of character and size in relation to the surrounding neighbourhood
- increased traffic flow on an already busy road and at a point where the visibility is poor
- inadequate on-site parking facilities, which will lead to parking overflowing onto the surrounding streets, exacerbating the problem that has already arisen as a result of the imposition of parking charges at Oldbury Court
- degradation of the site as a hub for charities, which will result in a loss of community services
- loss of privacy and increased noise and light pollution for the surrounding houses

Bristol Charities have not listened meaningfully to the concerns of the local residents and the current users of the Vassall Centre. The objective of the revised plans seems to be how to cram as many dwellings and people onto the site as possible without taking into account the impact on the quality of life of existing local residents or the intended residents of the site.

Please could you make a site visit so that you can appreciate the impact this project would have on our neighbourhood should the application be approved.

Thank you,  
Nancy Carlton

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Hello

Ref. 22/03476/F Vassall Centre, Gill Avenue, Fishponds, BS16 2QQ

Please see my objections to the above planning application.

We have 2 children who suffer from dust allergies, eczema and asthma. The disruption, dirt, dust, noise and asbestos for 3 or 4 years of development will harm us and our children physically and mentally. Both of our children have additional needs and we have used services from charities based in the vassall centre. The loss of these services, even for a temporary time, will be detrimental to us. The buildings works for 3 / 4 years will disrupt my children's routines and impact their leaning and behaviour.

The 3 story buildings are overbearing and out of character with the local area. We live opposite the vassall centre and we are concerned with the privacy into our homes and gardens from the 3rd floor of these buildings.

We get sunlight into the front of our house and a 3 story building directly opposite us will block the light into our home.

The area is already over crowded and this building project will cause more over crowding. This is a peaceful area and the if the development goes ahead it will cause the area to become busy and dangerous with more traffic.

The lack of parking is already an issue especially because Vassall Park is around the corner. People already park in front of my driveway to use the park and after the development parking is only going to be worse.

The vassall Centre is currently a hub where lots of charities base themselves, having these charities move out will be a detrimental to the local community.

Saira Bi

To Planning meeting 26 April 2023

The Vassalls Centre application

In many ways this is a good proposal for the whole site however the nursery, the building of the three storey block at the rear of the site and transport are of great concern

There is a good and popular Council Nursery school Little Hayes and a childrens centre within 400 yards of the development site so that the proposed nursery and the existing Council one will become unviable if a new nursery is allowed to go ahead which is of great concern in this deprived area.

The building of three storeys at the rear of the site adjacent to Little Hayes and Willowbed Close will give these homes no privacy in their gardens. Policy BCS21 advocates that consideration should be given to neighbouring privacy and drawing the tall buildings back a little will not achieve this

especially as the height will allow more overlooking.

Thirdly – transport, much is being made of the good transport which will allow people especially the elderly to access Fishponds and beyond easily. In spite of the bus stop opposite there are no buses on the whole estate, it is a busless zone and we have continually had to fight for the retention of previous buses at regular intervals right through the 20 years I have been a Councillor.

A site visit for the committee is a must for them to see the problems including the position of the existing nursery school and Childrens Centre which is a necessity and I ask that this should take place before any further consideration to this application is given.

Lesley Alexander

Councillor for Frome Vale

## Public Forum Statement

Objection to Planning Application 22/03476/F Vassall Centre, Gill Avenue, Fishponds, BS16 2QQ

The proposed development is out of character with the surrounding area, especially the residential buildings on its immediate boundaries. To state that 'the housing to the North and East of the site backs onto the boundary and faces the other way so was not considered directly relevant to the character of the site' yet to consider Fishponds commercial centre a mile away as relevant is unbelievable! How can housing that borders the development not be relevant?! Houses that 'face the other way' means that their gardens, where residents spend the majority of their outdoor time, will be most significantly impacted by the proposed development.

The 3-story elevation is not in-keeping with the surrounding residential area and causes significant issues of overlooking and overshadowing existing houses along the border, impacting on 'right-to-light'. As the proposed developments will be residential, they will be occupied 24/7 meaning that the invasion of privacy from being overlooked is greater than the existing buildings which are only occupied during working hours. There have been no scale diagrams or measurements given regarding proximity of proposed developments to the boundary which makes the impact very hard to determine. I have also not seen any information on what will happen at the actual boundary? Will there be a fence? A wall? What height?

The site is large enough for the buildings to be placed away from the boundaries and so limiting impact on existing houses. Scaling back the development to 2-storey buildings would also reduce the development time which is significant for those of us who live on the boundary of stage 1 and stage 2 and so will be living next to a building site, with all of its noise, dust, smell and pollution, for 4+ years.

As has been mentioned by other residents, there is no documentation regarding the protection of existing wildlife on the site or of safety considerations regarding the extraction and safe disposal of asbestos. There is also limited information about how the buildings will be 'sustainable'.

Parking has been highlighted by others as an issue, I haven't seen any info on what provision per dwelling is being included. Do all houses/flats have parking provision? Also are there provisions for sustainable travel alternatives such as secure bike stores? The immediate area already suffers from heavy parking on the roads and an influx of residents without parking provision will exacerbate this. Equally the area already has air quality that exceeds World Health Organisation limits for PM2.5, PM10 and nitrogen dioxide so making adequate provision for sustainable travel options and ensuring the site has excellent public travel options is also vital, especially with the introduction of the Clean Air Zone and the recent removal of all bus routes past the site (Number 5 and 47 both axed).

Additionally, the state of the road surface on surrounding roads is already very poor, this will only deteriorate further with any heavy goods vehicles regularly using them. The access roads need to be improved before any development starts and then assessed and further improvements needed as required following the commencement of any work.

Finally, it seems that the declaration of 'no existing tenants will be evicted' rings a little hollow when specific and adequate facilities are not being provided which consequently forces some charities to have to look elsewhere.

I request that the whole planning committee assess the site and consider the proposals in person.

Best wishes

Alexandra Heelis

Willow Bed Close resident

Dear Bristol City Council Development Control Committee A

Re. Planning Application 22/03476/F

Vassall Centre, Gill Avenue, Fishponds BS16 2QQ

I would like for the Committee to consider the following open letter, which is being published in the Oldbury Court Journal, a local newsletter.

<https://ocnp.org.uk/journal/vassall-centre-an-open-letter-to-the-bristol-city-council/>

The key point made by the open letter is that

"Bristol Charities' planning application is deeply flawed because 1. it fails to provide like-for-like facilities at the future Vassall Centre; 2. it fails to take on board the concerns of local residents; and 3. it entails a problematic bid to turn Bristol Charities into the local 'anchor' organisation."

I would highlight the following passage:

**"Contrary to the impression given by Bristol Charities, its proposals have not taken on board the numerous objections presented by Oldbury Court residents. Bristol Charities needs to do so if it is to meet not only the letter, but the spirit of planning law; and if it is to honour its role as a charity that wishes to engage in a constructive way with the local communities. A)** Bristol Charities has given the impression that it has 'listened' to local concerns and has amended its plans accordingly. Certainly it has had over a year to do so. Yet an open letter recently distributed by neighbours of the Vassall Centre points out that, in fact, Bristol Charities has done little or nothing to take on board their concerns. Anyone who compares the earliest proposals (circulated to the media in November 2021) with the current planning application will confirm that few if any changes have been made to address those residents' most serious concern – namely, that Bristol Charities needs to recognise that building a series of corporate-style, three-story blocks that will tower over the surrounding semis and their gardens (some privately-, but some also council-owned) is completely out of character with the neighbourhood, and will drastically affect privacy and in some cases the so-called 'right to light'. **B)** A case can be made that taller, and so potentially greener buildings are required to make more efficient use of the available space. However, by locating the blocks around the perimeter of the site, Bristol Charities is maximising the potential effects on privacy and access to light. The obvious solution is to group any taller buildings in the middle of the \*full\* site (and not in one or another 'half'[see point E below]); and to preserve enough of the current buffer around the perimeter to substantially mitigate the impact of the new development on surrounding homes. **C)** Despite making much ado of a new garden in the middle of the proposed redevelopment, it is clear that environmental concerns are not a priority for Bristol Charities. Most regrettably, the company is squandering a marvellous opportunity to put forward a really green set of proposals; these could include, for instance, using potentially vast roof space to generate solar energy not just for the site, but perhaps even for some of the local community. **D)** It is extraordinary that, proposing as it is to fill the Vassall Centre site with a high density housing development that will have hundreds of new residents, Bristol Charities is cutting current parking facilities by more than half. This is no 'green' feature of the development; it is simply a way of passing on the financial and practical costs of parking spaces to the local community. Oldbury Court's bus services have been recently cut, and many of the new residents/users may have little option but to drive if they can afford to. This

virtually guarantees that surrounding streets will fill up with cars; the surrounding cul-de-sacs were never designed for this, and so their residents' quality of life will be seriously affected by this aspect alone. **E)** Bristol Charities has made a very deliberate, and no doubt canny decision to divide the planning application for the site into two halves (thereby effectively concealing their intentions for the second half). Again, this is in keeping with the practices of aggressive for-profit developers; as a charity that is claiming to value engagement with the local community, Bristol Charities should come clean with its proposals for the whole site; this not least because proposing an integral plan for the whole site would enable the consideration of a repositioning of the tallest buildings."

I believe that the good councillors should schedule a site visit to see the issues for themselves.

Best wishes,

Nils Lindahl Elliot

## FAO Democratic Services

Please find below a public statement from Living Easton Heritage and Environmental Group for tomorrows Planning Committee.

Regards

IAN BECKEY (Living Easton Heritage and Environmental Group)

### **Public statement from Living Easton Heritage and Environmental Group with regards to the demolition of the Vassall Centre Fishponds Bristol Ref. No: 22/03476/F**

Living Easton Heritage and Environmental Group are a community based environmental and heritage organisation of around 20 individuals and affiliated societies based predominantly around the suburbs of Easton, Whitehall, Barton Hill and Lawrence Hill in Bristol who take a particular interest in heritage, planning and sustainability issues in East Bristol.

Whilst we welcome the new housing development for older people and those with learning difficulties/special needs together with a community hub we need to ensure that the pavements around the new community hub and Vassall Centre are fully accessible by providing enough dropped kerbs/castle Kerbs.

There is also the issue that buses no longer serve the Vassall Centre since the withdrawal of the First Bus 5 & 47 services to Oldbury Court following service cuts by the West of England Mayoral Combined Transport Authority Mayor Dan Norris. These service cuts are due to the freezing of the transport levy by Bristol City Council, BANES and South Gloucestershire Council causing the withdrawal of the 47 bus service (and the previous 5 bus service). The 47 bus served Yate bus station, Westerleigh, Pucklechurch, Emersons Green, Downend, Oldbury Court, Fishponds Road, Eastville Park, St Werburghs, St Paul's and Bristol city centre and was a very convenient service for many people using the Vassall Centre.

The previous 5 service served Downend, Oldbury Court Fishponds, Broomhill, Stapleton, Eastville park St Werburghs, St Paul's and Bristol city centre and was also useful for many people.

Now that both bus services have been withdrawn, there is no Westlink demand responsive bus service to replace it. An equalities impact assessment for a development that is being provided for vulnerable people and people with disabilities should have picked up on this issue.

A public transport bus service is essential for this development and a Section 106 financial contribution should be sought included as part of a green travel plan. The West of England Mayoral Combined Transport Authority Mayor Dan Norris should reinstate a public bus service under contract to that Authority serving Downend, Fishponds town centre, the Eastgate centre, Eastville and Bristol city centre.

We welcome the regeneration of the Vassall Centre, Fishponds, Bristol as a housing development for older people and those with disabilities as well as the community hub but currently the site does not have any public transport bus or community transport service.



The shops and facilities in Fishponds are too far to walk for some people for even basic food shopping as the supermarkets are on the main Fishponds Road and the library or health facilities are also some distance away.

As has been stated there is no public transport to Downend, Staple Hill or Emersons Green District centre so less able residents would not even be able to visit Oldbury Court or Eastville Park estate which are large destination parks for local residents and tourists.

We would like this issue to be fully addressed in any planning conditions that are set as part of a green travel plan with a Section 106 contribution to any bus service organised by Mayor Dan Norris and the West of England Mayoral Combined Transport Authority.

If public transport is not provided as part of the planning application, then it should be refused by the committee as not being compliant as per the local city plan.

IAN BECKEY (on behalf of Living Easton Heritage and Environmental Group)

Dear Sirs,

I write to protest most strongly about the proposed development above.

Very little attention has been paid to the properties that are directly behind in Little Hayes. May I request that the Planning Committee make a site visit to see for themselves the impact this will have.

Our gardens are south facing so get the benefit of sunlight all year round. This development will severely impact on that.

The car park and surrounding roads are full at the best of times with cars relating to the Vassall Centre. This is only going to get worse if this development, as it is, goes ahead.

The proposed plan is grossly overcrowded and overbearing for the size of the plot and out of keeping with the surrounding area.

I am not against redevelopment but not on this scale.

We have been given very little time to submit objections all through this process.

Yours faithfully.

Linda Williams