

APPLICATION NO 09/05111/T: ZOO PARKING AT LADIES' MILE

OBJECTIONS FROM THE RAMBLERS (AVON AREA AND BRISTOL GROUP)

Summary

I Objections

- 1 The Ramblers object strongly to the Zoo using the Downs grassland as a car park because:
 - (a) *it contravenes legislation, national planning guidance, and present and proposed local planning policies.* All these require the Downs' glorious green spaces to be strongly protected and managed for recreation.
 - (b) *it is bad for the people of Bristol.* It prevents them from enjoying one of the finest parts of the Downs on sixty of the best days of the year.
 - (c) *it is bad for Zoo visitors.* The site is physically unsuitable for families and the less mobile, with no provision for the disabled; it is subject to unexpected closure; access is often congested; the site is full to capacity at peak times; and the availability of cheap parking encourages overcrowding at the Zoo.
 - (d) *it is bad for wildlife.* The grassland has been damaged and will recover only if parking ends.

II The Zoo's case

- 2 The Zoo's case for continuing to park on the Downs is weak:
 - (a) *Need for revenue to undertake local conservation work.* The Zoo's Director has confirmed that conservation work close to the Zoo will not be affected. Other work is not a planning consideration.
 - (b) *Need for revenue to undertake global conservation initiatives.* Not a planning consideration.
 - (c) *Lack of alternatives.* The options have not been examined adequately. There is scope to develop the Zoo's own car park, to provide significant Park & Ride facilities, and to encourage more use of public transport, walking and cycling. The Zoo has the resources for substantial capital projects.
 - (d) *Importance of the Zoo to the city's economy.* The Zoo is a valuable amenity but does not make a major contribution to Bristol's economy. Its viability is anyway not dependent on the availability of Downs' parking. Zoo visitors who use the Ladies' Mile car park spend little or no money elsewhere in Bristol.
 - (e) *Adverse transportation effects if parking on the Downs were not available.* The Ladies' Mile car park produces significant adverse travel effects. If the Zoo stopped using it, continuing adverse effects could be avoided by the Zoo making proper alternative provisions.

III Conclusions

- 3 The application should be refused: the Zoo has had 'temporary' licences and permissions for over forty years; it has ignored planning constraints and conditions; and has made little attempt to improve parking provision. It has no incentive to provide proper parking for its visitors while Downs parking is allowed to continue, costing it nothing. There are interim arrangements that could be made quickly for visitors this year while the Zoo decides which combination of permanent provisions to pursue.

DETAIL

(Each of the points above is explained in more detail in this section)

I Objections

(a) Contravention of legislation, national planning guidance, and present and proposed local planning policies

1 Legislation

Under the Clifton and Durdham Downs (Bristol) Act 1861 the site should be protected for the inhabitants of Bristol and surrounding areas to enjoy. It cannot be enjoyed when covered with cars.

2 National planning guidance

The use of the site for car parking was judged in 2003 to be clearly contrary to the aims and objectives of Planning Policy Guidance Note No.17 'Planning for Open Space, Sport and Recreation' (July 2002). Since then national policies have given even more importance to the protection of green spaces in cities and opportunities for activities such as walking.

3 Conflicts with the adopted local plan

These were set out in planning officers' reports in 2003 and 2008. The site is within the Downs Conservation Area. It is a protected area of Open Space, a Historic Landscape and a Citywide Site of Nature Conservation Interest within the adopted Bristol Local Plan. It should therefore be fully protected, especially under policy NE1 which states:

"Sites which are important for nature conservation, recreation, historic landscape interest, landscape quality, visual amenity, community or outdoor leisure related use, or providing setting or relief to the built environment, will be protected as open space"

and

"Development involving an unacceptable loss of important open space, or which would have a significant adverse effect on the interest, use, amenity, character or accessibility of such open space, will not be permitted."

and

"Development resulting in the unacceptable loss of ... recreational open space will not be permitted."

The Downs are Bristol's premier open space and the site of the Zoo's car park is one of the best parts. As the Planning Officer's report stated in 2003: "Purely on the basis of Local Plan Policy, the proposals should be rejected".

4 Emerging plans for Bristol

Bristol's Local Plan was adopted in 1997 and is due to be replaced by the Bristol Development Framework. After extensive consultation, the Framework's Core Strategy (Publication Version) was issued in November 2009. While this strategy is not yet adopted policy, it would be prudent to take it into account in making decisions with land use implications beyond the next year or two.

The Core Strategy makes little mention of tourism, suggesting enhancement only in the city centre and where accessible by walking, cycling and public transport. As far as we could see, the Strategy does not mention the Zoo at all. It does however put great emphasis on protecting and enhancing the natural environment and ensuring best use is made of open spaces to meet the needs of residents and employees in the city, and to attract would-be investors. More details are in Box 1. The Downs are included in the strategic green infrastructure network covered by Policy BCS9 :

"The integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced... Open spaces which are important for recreation, leisure and community use, townscape and landscape quality and visual amenity will be protected... National and local sites of biological and geological conservation importance will be protected."

Box 1: relevant references in the Bristol Development Framework Core Strategy, Publication Version, November 2009

Tourism

Spatial vision (page 17): "The city centre will have an enhanced cultural and tourism offer for residents and visitors with new regionally important facilities complementing the city's established venues and facilities."

Para 3.5, objectives, no.5: "... Bristol will have open space and green infrastructure ... and tourism facilities which are accessible by walking, cycling and public transport. This will help enable active lifestyles, improve quality of life and reduce pollution."

Para 4.2.4: "The opening of the £500m Cabot Circus development in 2008 has significantly strengthened the city centre's retail and tourist offer and created an estimated 5,000 jobs. The diversity and excellence of its arts and cultural facilities are also a significant factor in the city centre's vibrancy and attractiveness to residents and visitors alike."

The economy generally

Para 2.16: "The city centre is the largest employment area in the sub-region providing approximately 109,500 jobs. It is the South West's office capital and a nationally important location for banking, insurance and professional services. Significant public sector employment is provided by employers such as the NHS, Bristol University and government agencies."

Para 2.17: "The city's industrial areas also contribute to Bristol's economic diversity."

Para 4.8.2, delivering a thriving economy: "A major strength is Bristol's wide and varied economic base including aerospace, engineering, information and communications technology, electronics, financial and legal services, creative and media industries and environmental technologies and services."

Para 4.8.8: "The Employment Land Study has identified key economic sectors with potential to grow. These are: aerospace and advanced engineering; banking and insurance; professional services; creative industries; environmental technologies; information and communications technologies; public administration; and wholesale and distribution."

Cont on next page

Box1 cont

Green spaces and the Downs

Para 2.18: "Bristol has more green spaces than any other British city ... in 2008 Bristol was chosen as the only city in the UK to be shortlisted for the European Green Capital Award."

Environment / physical issues, no 11 (page 12): protecting and enhancing the natural environment and ensuring best use is made of open spaces to meet the needs of residents and employees in the city."

Spatial vision (page 14): "Our overarching vision is for a less car-dependent city and an emphasis on walking... We will aim for a city with ample and high quality green open spaces and public realm with new green links and enhanced public access throughout."

Para 3.2: "A prosperous, cohesive and sustainable city, a regional and green capital which is a great place to live."

Para 3.5, objectives, no.7: "A high quality natural environment where valued open spaces and biodiversity are conserved and enhanced and a green infrastructure network is maintained."

Pages 66 to 71 inclusive – importance of green infrastructure.

Para 4.9.1: "This policy aims to protect, provide, enhance and expand the green infrastructure assets which contribute to the quality of life within and around Bristol."

Para 4.9.4: "A number of open spaces, waterways, biological sites, corridors within the wildlife network, landscape features and countryside form the strategic green infrastructure network, which is important at a citywide scale." [This includes the Downs]

(b) Parking on the Downs is bad for the people of Bristol

1 General

The Downs have been valued by the people of Bristol for centuries, first for rights of common and then for exercise and relaxation. They are extremely well used by residents and visitors alike for a range of recreational activities. With the Gorge and Suspension Bridge, they must rate as Bristol's greatest attraction. Many people walk or run on the Downs daily and in summer many Bristol residents spend much of their time there.

2 Landscape importance

The City Council's landscape section explained why the site used for Zoo parking was particularly important when they opposed the 2003 application. The site occupies a high point on the plateau, with excellent views and away from traffic. Rows of cars are visually intrusive, from close to and, because the site is high, from far away.

3 Recreational importance

The site of the Zoo car park is important for a range of recreational activities. It is on several routes across the Downs popular with walkers and joggers. The car park makes these routes unusable for long periods. If walkers or joggers do venture across, cars block their way, are visually intrusive when parked, and noisy and dangerous when moving. This matters because areas for carefree, uninterrupted walking and jogging are limited by other (legitimate and welcome) activities on the Downs. For example, the adjacent area across Ladies Mile has been made a wildflower reserve, reducing access.

When the site is not used as a car park, it is popular for picnics and ball games. It is flat, open and away from traffic. Although parking has reduced the ecological interest of the site, the grass is still attractive.

4 Timing

The Zoo's use of the Downs coincides with when people most want to be there: weekends from Easter to September and the school holidays. Because the public is unclear about the Zoo's pattern of use – which is anyway unpredictable - some avoid the site for more than 60 days and for longer hours than necessary.

(c) Parking on the Downs is bad for Zoo visitors

1 Physical unsuitability of the site

The car park is on the grassland of the plateau, high above the Zoo. To reach the Zoo, visitors must descend a steep stony path, slippery in wet weather, through trees. At the bottom is a very busy main road with the Zoo on the opposite side. The steep path is difficult for families with young children and for the less mobile to negotiate. Coming out onto a busy main road is especially dangerous for excited young children. It is not possible to provide parking for the disabled on the site and there are very few spaces for the disabled at the Zoo: seven at the front and about a dozen in College Road

2 Availability of parking on the site

The car park provides insufficient and unsatisfactory parking. It is closed without advance warning in fine weather if the ground is still wet from earlier rain. At peak times it is full. In a long hot summer the number of visitors would be greater than the capacity of the Zoo's permanent car parks on more than 60 days. Visitors' arrivals are concentrated in a short period. All this leads to traffic chaos and congestion. The Pinnacle report that accompanied the Council's application recognises only the access problems when arrivals peak: it is unclear whether the measures proposed will solve them.

Confusion about the site's opening hours leads to unauthorised parking when the Zoo is not using it. This is unsightly and potentially damaging if the grass is wet. Such parking now also brings a risk of a fine and wheel-clamping.

3 Consequences of cheap parking for the quality of the visitor experience

One of the Zoo's two charitable objects is "to advance the public understanding ... of wildlife and the natural environment". Allowing visitor numbers to rise to up to 5,000 at peak times reduces the quality of the visitor experience to such an extent that little

understanding can be gained. The residents of Bristol know this and most avoid the Zoo at peak times. Pinnacle's survey in August 2009 showed that about 90% of visitors using the Downs car park came from outside Bristol. If plentiful cheap parking were not available at peak times, numbers would be likely to be reduced.

(d) Parking on the Downs is bad for wildlife

The ecological surveys produced by Wessex Consultancy from 2006 to 2009 show an increased frequency in the car park of species associated with disturbance and a reduced frequency of many species associated with unimproved grassland. The consultants conclude:

“Unimproved grassland is the habitat of greatest nature conservation value on the Downs and is a Biodiversity Action Plan (BAP) priority habitat. The decline in these species...therefore represents a minor adverse ecological impact. However.....the area continues to be of nature conservation value and ...if car parking ceased then reinstatement of the grassland could be largely successful”

II The Zoo's case for contravening planning policies

General

In their letter accompanying the Zoo's application, WYG Planning and Design make an extremely weak case for contravening national and local planning policies. They repeat essentially the same points made in relation to previous planning applications. Successive planning committees have found them unpersuasive and have made it very clear to the Zoo that parking must end. In October 2008 most members of the Planning Committee appeared exasperated. They gave the Zoo a year to "sort itself out" (to quote the Chair's closing remarks), not to return with the same arguments as before.

The following paragraphs consider the various points made by the Zoo in the order of the summary on page 1.

(a) Local conservation work

WYG suggest that "it is important for the Zoo to maintain its visitor numbers as the revenue generated from these visitors allows the Zoo to undertake its much valued local conservation work". The planning system does not, on the whole, allow judgements about the value of applicants' activities beyond the site in question. These activities are not in general a material consideration and decisions can be challenged if they are taken into account. None of the Zoo's local conservation work features in the draft section 106 agreement. Nor is the Zoo's participation in the Avon Gorge and Downs Wildlife Project dependent on the grant of planning permission as some have suggested. The Zoo's Director made this clear in a letter of 19 November to the City Council in relation to its application to the Downs Committee for a licence:

- “Bristol Zoo's commitment to the Avon Gorge and Downs Wildlife Project is unconditional and entirely unrelated to the Ladies Mile licence.”

(b) Global conservation work

Similarly WYG claim that revenue from visitors allows the Zoo to undertake global conservation initiatives which bring the Zoo, and the city of Bristol, international praise. No evidence is given of such praise for Bristol, nor any attempt made to explain its relevance in planning terms. Praise for the Zoo and the value of its global conservation initiatives are not material planning considerations.

(d) Alternatives

1 General

NB Figure 1 of Pinnacle's report shows the approximate location of the car park but the site is twice as large as shown.

The review of options undertaken by Pinnacle Transportation Ltd is disappointing. It looks superficially at options which have been examined before. The survey information mainly confirms what was already known. The review includes continued use of Ladies Mile as an option when councillors made it very clear that this should no longer be considered. It also includes a 'do nothing' option, an irresponsible alternative unsuitable for Bristol's main paying visitor attraction.

Consultants should have been appointed in October/November 2008 to draw up an action plan for accommodating visitors without Ladies Mile, not commissioned fairly late in 2009 to produce an analysis showing that the use of Ladies Mile is most convenient for the Zoo.

The report looks at each option in isolation and concludes that parking at Ladies Mile will be needed 'for the foreseeable future'. The potential of individual options is under-estimated (see below) and no attempt is made to consider their combined effect. When this is done, it is clear that the use of Ladies Mile can end. The Zoo can either develop its own West car park as a complete replacement, or – more sustainably – develop the car park more modestly and provide Park & Ride facilities from Portway, while encouraging greater use of public transport, walking and cycling.

2 Development of the Zoo's West car park

Of the three car parks in use, the Zoo owns only the West one on College Road. This is a surface car park with 160 spaces. (The North car park is, we understand, part of the Downs. The Zoo gradually appropriated it decades ago.) Paras 4.4 to 4.8 of Pinnacle's report consider the addition of a single storey to this car park. The report suggests that this would provide only an additional 20 spaces because of the irregular shape of the site. Yet, as Figure 1 to the report shows, the site is almost rectangular, with a relatively small addition and a small section removed. (We asked the consultants for an explanation of their conclusion in December but they have so far been unable to supply one.)

A single storey is anyway unambitious. This is a brownfield site surrounded mainly by four storey houses. Because it is in a Conservation Area, any development would need to be designed to fit in with its surroundings, but there is no reason in principle why a modest multi-storey car park should not be approved. This might have one or two levels underground and a mix of two to four storeys above ground. This could accommodate up to 600 cars.

Para 4.5 of the Pinnacle report sets out the considerable advantages of developing this car park. The arguments against developments set out in para 4.6 are very much weaker, notably:

- **A permanent solution for a temporary problem.** Not so - this should be the Zoo's main car park, used all year round, not only on peak days.
- **Cost.** No estimates are given: in any event, the Zoo, like other responsible organisations, should expect to pay to provide parking for its visitors, not to profit by charging for the use of public open space.
- **No encouragement of sustainable modes of travel.** This depends on how many parking spaces are provided, how much people will have to pay for them, and what other encouragement is given for sustainable modes of travel. The continued provision of cheap parking on Ladies Mile would not encourage sustainability.

Overall, this is the obvious solution to the provision of parking for those visitors for whom Park & Ride, public transport, walking and cycling are not feasible options. Building a well-designed, substantial car park, largely underground, would remove the need not only for the use of Ladies Mile but also for the North car park for at least some of the year. This would reduce the congestion caused in the main road by cars going in and out. The North car park could then be made more visually attractive, possibly even resembling the fine downland there before Zoo parking.

3 Park & Ride facilities from Portway

Section 3 of Pinnacle's report contains useful background information on Park & Ride services. It reveals significant scope for using the Portway site relatively cheaply.

The Zoo's offer

The Zoo is offering to provide a trial Park & Ride service on five bank holidays and four associated Sundays, i.e. 9 days altogether. The estimated gross costs are £1,750 per day plus publicity and "a small cost associated with security", say £20K in total. The Zoo is undertaking to do this for only one year if occupancy is 50% or less. This seems inevitable: charges higher than those for parking at Ladies Mile are suggested and it is assumed that the Ladies Mile facility will continue. This is a token scheme, apparently designed to fail.

Full potential

The Pinnacle report examines more extensive Park & Ride possibilities from Portway but under-estimates their potential and exaggerates their cost. It points out that in theory Park & Ride here could attract 63% of visitors to the Zoo on peak days, equivalent to 385 to 770 cars. This would make parking on the Downs unnecessary. The subsequent analysis in paras 3.12 to 3.15 assumes, however, that Downs parking continues so that the Park & Ride service would attract only 20% of these visitors.

The costs in para 3.15 take account of existing parking income that would not exist if the Ladies Mile facility were removed and of hypothetical incentives to use the service that might not be necessary. It does not take account of the corresponding income from Zoo admissions. The concrete figures in this analysis show a cost of only £900 a day (£1,650 for the contract less £750 revenue). More use would reduce costs. (The Council's Park & Ride section has confirmed that there is always plenty

of spare capacity on Saturdays and at least 200 spaces on weekdays. On Sundays and bank holidays the car park is not currently used at all in summer).

A Park & Ride service could be very attractive. Journeys could be made simpler and faster than parking on the Downs by selling tickets on the bus, avoiding the path from the Downs car park and the queues at the entrance. Heavily discounted or free rides could be offered at first to attract people. The Zoo might consider running a fleet of minibuses instead of double-deckers to use the scenic route along the Gorge and up Bridge Valley Road.

4 Greater use of public transport, walking and cycling

Section 5 of the Pinnacle report considers initiatives to encourage visitors to travel by sustainable modes of travel. It is extraordinarily weak. It sets out possibilities such as further discounts, increased marketing, parking charges and improved pedestrian and cycle routes, but does not explore them in any depth. Nor does it suggest that the Zoo is going to implement any of them. It asserts that the Zoo has been successful so far, claiming as a victory the high car occupancy level compared with commuters. It seems unlikely that the under-3s who make up a high proportion of visitors would drive themselves!

In practice, since 1998 the Zoo has been working on travel plans for visitors that have achieved nothing. In 1998, 80% of visitors arrived by car, 10% by coach and 10% came by public transport, walking or cycling. In May 2009, 91% of those surveyed came by car, none by coach, and 9% by public transport, walking or cycling.

Para 5.5 of the Pinnacle report produces very weak arguments against encouraging more sustainable travel. It ignores recent developments such as the much improved bus services to the Zoo and the more frequent trains on the Severn Beach line, including a Sunday service. It is no doubt right to conclude that this is not a realistic option on its own, but much more could be done.

5 Need for resources

Ladies' Mile costs

The construction of a multi-storey car park on the West car park and the provision of Park & Ride facilities would cost money. This makes them less attractive to the Zoo than continuing to pay nothing for 666 spaces. Indeed, the Zoo probably makes a profit from the Ladies Mile car park. With an average of 220 cars on 60 days of the year paying £2 each, its revenue will be £26,400, of which one third (£8,800) goes to the Downs Committee, leaving a balance of £17,600. They use their permanent employees as attendants, moving them from car park to car park. The only additional costs for the Zoo are a modest annual ecological survey and even more modest contributions (£1,000 every few years) to the maintenance of the path to the Zoo.

Past activities

The Zoo is well-resourced and can afford to provide proper parking. In the last 25 years it has redeveloped every part of its site, in some cases twice e.g. the monkey enclosures. Box 2 shows the financial position of the Bristol, Clifton and West of England Zoological Society, of which the Zoo is the largest part, in recent years, together with projects carried out.

Box 2: Income, spending and projects since 2005 (Bristol, Clifton and West of England Zoological Society)

2009: income – not yet known; spending – not yet known.

Projects: Explorers Creek, Feed the Lorakeets, Forest of Birds, a revamped play area with new catering facilities, and Zooropia.

2008: income £7.8m, spending £7.2m.

Projects: Butterfly Forest.

2007: income £8.7m, spending £7.5m.

Projects: expanded programme of daily events at the Zoo; three teams appointed to develop designs for the National Wildlife Conservation Park.

2006: income £5.9m, spending £5.1m

Projects: Monkey Jungle; £6.8m obtained for Phase 1 (design) of the National Wildlife Conservation Park (including £1.5m grant from the Regional Development Agency and a £1.5m bank loan).

2005: income £4.3m, spending £4.2m.

Projects: Monster Creepy Crawlies exhibition; start of Monkey Jungle development; £160,000 on National Wildlife Conservation Park development.

Strategic Plan

The Zoo's strategic plan for 2008 to 2018 contains ambitious plans for developing a National Wildlife Conservation Park on the Society's 55-hectare estate at Hollywood Towers, Cribbs Causeway. This was scheduled to open in 2012, subject to the £70m required being available, with further development thereafter. The funds are not, however, available and the project will need to be rescheduled or abandoned. The Zoo has scaled down its fund-raising activities in the current economic climate.

The strategic plan proposes a range of developments at the Zoo too: a shop extension; teaching facilities, animal holding and offices; central play and activity area; two new exhibits; a Tropical Forest House; an area for lavatories, storage and visitor use; a landscaping and small exhibit scheme; and an all-weather zoo. **No parking improvements are proposed.**

Immediate plans

Its latest annual review reports that the Zoo is planning to build a "major new animal exhibit" in 2010/2011.

6 Importance of the Zoo to the city's economy

General

The Zoo's application exaggerates its importance both to visitors and to Bristol's economy.

Visitors

The Zoo is certainly much loved by many Bristolians and attracts visitors from beyond the city's boundaries, particularly from South Wales. It is proud of being the city's largest *paying* visitor attraction but this is in a city that does not boast many. Even so, it was temporarily topped by the three @ Bristol attractions (Explore, Wildscreen and the Imax).

The Zoo is not Bristol's top visitor attraction when the city's 'free exhibits' are taken into account : the Suspension Bridge, the Avon Gorge, and Bristol's historic harbour all have a broader appeal.

Economic significance

The latest planning documents stress the importance of Bristol's green spaces, of which the Downs are the most prominent and best loved, both for residents and inward investors (see summary of the Bristol Development Framework core strategy in box 1 on page 3). The Zoo is not mentioned.

With 142 employees (about the same as a small supermarket) and an income of under £8m, the Zoo's contribution to the city's economy is limited. There are 110,000 jobs in the city centre, and the Cabot Circus development alone cost £500m and created 5,000 jobs. There is no suggestion anyway that the refusal of planning permission for the Downs car park would threaten the Zoo's viability. There is hence no inconsistency with the current local plan policy to protect tourist attractions. The surveys undertaken in August 2009, quoted in Pinnacle's review of options, showed that only 17% of the users of the Downs car park said that they would not visit if parking there were not available (though no doubt they would be happy with a suitable alternative). This is a very small percentage of the Zoo's total visitors in a year. The Zoo's application suggests only that the amounts it gives to conservation work beyond the Zoo's boundaries would be affected.

As for the potential loss of spending by Zoo visitors elsewhere in the city, this is negligible. The August surveys confirm that at peak times about 90% of users of the Downs car park come from outside Bristol. They arrive in the late morning, stay about 4 hours and then leave. Most come along the Portway from South Wales and it is very unlikely that they spend any money in Bristol other than at the Zoo.

7 Adverse transportation effects

WYG's letter accompanying the Zoo's application quotes policy M1 of the Local Plan which states that development should avoid "the introduction of traffic of excessive volume ... onto unsuitable highways or into residential or other environmentally sensitive areas". The Zoo's car park on the Downs does exactly that: on peak days it brings about 700 cars onto the Downs, just when the people of Bristol wish to enjoy their tranquillity. Pinnacle's report on traffic conditions acknowledges that there is congestion and queuing on Ladies Mile by Zoo traffic. There are plans to close Ladies Mile to traffic on summer Sundays so that the Downs may be better enjoyed. Continuing use by the Zoo would be anomalous.

WYG's letter suggests that closure of the Ladies Mile car park would lead to problems with cars looking for spaces on surrounding residential streets. Proper provision of alternatives by the Zoo, through development of its own car park, the introduction of extensive Park & Ride facilities, and more encouragement of the use of public transport, walking and cycling, would avoid this.

Conclusions

History

It is time to end the 40-year saga of the Zoo seeking "temporary" licences and permissions. It is a sad story of broken promises, combined with delays and breaches of conditions, as shown in Box 3 below.

Box 3: History of zoo parking on the Downs

1969 to 1996: Use of the current site on the Downs steadily increased from 6 to 56 days.

1996: Zoo sought permission to park on 102 days and the Downs Committee approved an increase to 81 days.

1997: Objectors drew attention to the breach of planning law, as parking on the Downs for more than 28 days requires planning permission. Bristol City Council's planning enforcement team wrote to the Zoo and the Downs Committee pointing out that parking required planning permission.

Easter 1998: Zoo used 40% more space on the Downs than it had applied for.

March 1999: Planning permission granted for one year only, after more than 1,000 people objected.

February 2000: A further planning permission for 60 days' use in 2000, 50 days' use in 2001 and 40 days' use in 2002.

December 2002: Zoo applied again for permission for 60 days a year.

Summer 2003: No decision on the planning application so the Zoo continued parking without planning permission.

September 2003: Permission for two years granted, subject to a section 106 agreement which took 2½ years to finalise.

Summer 2004 and summer 2005: Zoo again able to park without planning permission because section 106 agreement was being negotiated.

March 2006: Two year permission agreed in 2003 came into effect.

March 2008: Zoo applied for a further three-year permission. It had undertaken only two of the ecological surveys agreed in 2003 should be undertaken annually.

Summer 2008: Planning application undecided so Zoo again parked without planning permission.

October 2008: Planning committee decided unanimously that parking must end and gave the Zoo a year to find alternatives.

March 2009: Section 106 agreement signed, so that planning permission came into effect.

December 2009: Zoo submitted current application.

Zoo action on parking

For the past 40 years the Zoo has made no significant improvement to parking provisions, although its income and visitor numbers have risen substantially. In 1998 it promised that it would need to park on the Downs for only five more years. Its West car park with 160 spaces opened in 2002, but this only replaced parking that had previously been available at Clifton College.

When seeking planning permission in 2003, the then new Zoo director, Dr Jo Gipps, acknowledged that parking on the Downs was unacceptable and said "I am personally committed ... to rectifying the situation". In the subsequent six years nothing has been done to improve parking while the Zoo has, as shown in Box 2 above, undertaken a succession of projects at the Zoo and spent about £7m on plans to develop its site at Cribbs Causeway. It seems unlikely that these plans will ever be realised.

Recent developments

The Zoo's actions over the last 15 months have been typically dilatory:

October 2008	Planning committee says parking must end. Zoo given a year to make alternative arrangements.
Spring 2009	Zoo establishes a 'task and finish' group to consider possibilities, led by WYG planning consultants.
28 May 2009	Group first looks at options.
August 2009	Pinnacle Transportation undertakes surveys of users of the Ladies Mile car park and parking in surrounding streets.
September 2009	Pinnacle produces draft review of options.
October 2009	Task and finish group meets again
9 December 2009	Briefing meeting with councillors and interested groups.
16 December 2009	Planning application submitted.

Recommended action

The Zoo has no incentive to provide proper parking for its visitors while Downs parking is allowed to continue. By doing so little since 2008 and by making its application so late, the Zoo may assume that permission will be given for another year at least. This is unnecessary. There are interim arrangements that could be made quickly. The Zoo could then do a proper cost benefit analysis to decide which combination of permanent provisions to pursue.

Possible interim arrangements include:

- **Park & Ride provisions.** Steps should already be underway to provide Park & Ride services from Easter onwards. These could be made substantially more extensive and cheaper than currently proposed to encourage their use. At Portway, as elsewhere, people have proved very responsive to offers of free travel: the site is particularly well used by grandparents with their grandchildren, all of whom travel free, in the school holidays.

- **More encouragement of public transport use.** The Zoo could offer greater discounts.
- **Increased parking charges at peak periods.** At present the Zoo charges a flat £2 throughout the year. By charging more at peak times, it could ensure that only those who need to park near the Zoo do so then.
- **Increased admission charges at peak times.** Again the Zoo does not vary its charges.
- **Temporary additional deck on the West car park.** We understand it is possible to erect a temporary additional storey very rapidly.

There are very clear planning grounds for refusing this application. The Zoo has failed to show that there are material considerations to justify granting permission. Parking should end now.

Susan Carter
Environment and Planning Officer
28 January 2010