

# Bristol Local Plan Examination

Matter 2: Housing Need, Requirement and Supply

Written Statement prepared by Savills  
on behalf of Bristol, Clifton & West of England Zoological  
Society  
(Participant ID 418)

## Introduction

1. Bristol, Clifton & West of England Zoological Society (BCWEZS) submits this Statement in relation to the following Issue identified under Matter 2 of the Inspector’s Draft Matters, Issues and Questions:

Issue 2.1: Whether the Plan establishes a housing requirement figure that is positively prepared, justified and consistent with national policy (Policy H1).

2. This Statement responds to the following questions set out under the above Issue:
  - Q2.3a
  - Q2.3b
  - Q2.3c
  - Q2.4
3. BCWEZS own Bristol Zoo Gardens (herein referred to as ‘the site’) and have engaged in the emerging Bristol Local Plan throughout the plan making process.
4. Since the submission of Reg 19 representations, Acorn Property Group Ltd (Acorn) have exchanged contracts to acquire Bristol Zoo Gardens. This hearing statement has been prepared on behalf of both BCWEZS and Acorn.
5. A copy of the representations submitted during the most recent Regulation 19 (‘Reg 19’) consultation can be found at the following link as respondent number 418: <https://www.bristol.gov.uk/files/documents/7679-240508-catalogue-of-representations-received-may-24/file> or [https://files.smartsurvey.io/3/1/00DZ3ZH4/237071417\\_20966066\\_3299418.pdf](https://files.smartsurvey.io/3/1/00DZ3ZH4/237071417_20966066_3299418.pdf).
6. As requested within IN4 Appendix 2, we have not repeated our Reg 19 concerns which remain outstanding but have referred to them where we feel this is helpful. This response should therefore be read in conjunction with the Reg 19 comments.
7. Since the Reg 19 consultations in November 2022 and November 2023, planning permission (ref: 22/02737/F and associated Listed Building Consent 22/02889/LA) was granted in June 2024 for the residential redevelopment of the site, to include the delivery of 196 dwellings. The description of development is as follows:

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

8. A link to the full planning application and all supporting evidence base is available here <https://pa.bristol.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>
9. The granting of planning permission demonstrates the site is suitable for development, however as outlined below, it remains un-allocated in the emerging Local Plan, despite Bristol City Council (BCC / the Council) relying upon it for their housing provision.

Q2.3a: Is the overall capacity figure of 39,798 dwellings based on a robust assessment of potential supply (including windfalls and ‘urban potential’)? Have all available sources of land for residential development been fully considered and robustly assessed?

10. The Council’s own evidence base demonstrates they have failed to undertake a robust assessment of potential supply, and failed to fully consider all available sources of land for residential development, nor robustly assessed them. This is despite the Plan falling short of planning to accommodate the objectively assessed need.
11. This is demonstrated below by the Council’s lack of evidence for assessing the site. Documents referenced below include the Strategic Housing Land Availability Assessment (SHLAA), dated April 2024 (EVEH01) and the Housing Need and Supply Topic Paper (April 2024) (TPC004). It should be noted that both of these documents were prepared just shortly before the submission of the Plan, and we understand them to be the Council’s primary source of evidence for the housing supply matter.
12. In answer to the first question, the Council has failed to undertake a robust assessment of potential supply. As outlined in the Housing Need and Supply Topic Paper (TPC004), the Council’s strategy places a minimal priority on allocating sites for residential development. It includes the following table of what they consider ‘sources of deliverable housing supply to 2040’.

Source	Capacity
Areas of growth and regeneration	20,386
Planning permissions	9,087
Existing development allocations	1,381
Proposed development allocations	1,125
Green Belt locations	1,400
Small sites windfall	3,600
Urban potential	2,219
Student accommodation	600
<b>TOTAL</b>	<b>39,798</b>

13. The Council is only looking to accommodate 2.8% of the total homes through development allocations. Instead, they are relying heavily upon windfall sites (as defined within the Glossary of the NPPF as a site “not specifically identified in the development plan”). When Areas of Growth and Regeneration, Small Site Windfalls, and Urban Potential Sites are considered as ‘windfall’ sites, this represents 65.8% (26,205 of 39,798) of the capacity identified by the Council. This is considered an exceptionally high level of the plan’s housing capacity which has not been effectively planned for or demonstrated to be developable, deliverable or available.
14. The Topic Paper makes reference to sites with planning permission having a capacity of delivering 9,087 homes, however no methodology or breakdown is provided to confirm how this figure is calculated, nor which sites are included. Taking this figure on its face, they are reliant upon sites with planning permission delivering 22.83% of the overall housing supply over the plan period.
15. Turning to the second question, in response to Preliminary Question 18 in Inspector’s Document IN2 (EXA024), the Council claim Appendix C of the SHLAA assesses sites submitted at Reg 19 stage. The Council have been aware of BCWEZS’s intentions to redevelopment the site since 2020 and BCWEZS have made several Call for Sites submissions and representations to both Reg 19 consultations. Notwithstanding, when identifying sites to assess and allocate, the Council failed to include the site within this list of assessed sites in Appendix C of the SHLAA. It is unknown how many other submitted sites were not assessed, but demonstrates their approach is not fully considered, justified or sound.
16. Despite failing to assess the site for future allocation, it is clear that the Council’s approach is to discount sites from the SHLAA which have planning permission. This is irrespective of whether there’s merit in allocating them to provide certainty to their long-term future.

17. There is no clear justification why Bristol Zoo Gardens, which has been granted planning permission (and therefore the Council has considered to be acceptable to accommodate residential development), has not been fully assessed, nor in turn allocated for development within the draft Local Plan. On the one hand, the Council are heavily relying upon sites with planning permission to enable them to deliver their housing supply, yet at the same time, failing to provide the certainty of allocation. As an example, the Bristol Zoo Gardens permission is currently the subject of a Judicial Review lodged by objections to the application. Should that result in the permission being quashed then absence of an allocation would leave unnecessary uncertainty regarding the acceptability of the principle of development.
18. The Council's current strategy in choosing not to allocate sites with extant planning permissions may create significant issues during the plan period. If such permissions are not implemented, the principle of development at that site for that use may be considered expired. This approach misrepresents the level of development that could come forward in the plan period as the 9,087 homes listed in the table could expire within the first years of the Plan.

Q2.3b: Does the evidence demonstrate there are no other sustainable sites for residential development within the plan area during the plan period, including sites allocated or in use for other uses?

19. The Council has failed to provide an evidence base to show there are no other suitable sites for residential development within the plan area during the plan period.
20. The Council's Sustainability Appraisal ('SA') (CSD004) dated 2023 includes Table 15 (*Predicting and evaluating the effects of Publication Version November 2023 Draft Local Plan Site Allocations against Appendix 2 Framework to inform the prediction and evaluation of the effects*) which assesses each of the draft development allocations against the draft Policies of the plan. This table fails to assess any of the sites which were submitted to the Council but not put forward for allocation (for example those included within Appendix C of the SHLAA). No justification is given for excluding these sites, and the purpose of the SA therefore fails as the Council has not assessed all reasonable alternatives.
21. In the absence of site-specific SAs by the Council, Savills (on behalf of BCWEZS) applied the same methodology by the Council and undertook their own SA for Bristol Zoo Gardens. This was included in the reps submitted at Regulation 19 stage (available on page 3 at the following link: [https://files.smartsurvey.io/3/1/00DZ3ZH4/237071417\\_20966066\\_3299418.pdf](https://files.smartsurvey.io/3/1/00DZ3ZH4/237071417_20966066_3299418.pdf)).

22. The site scored positively across almost all of the metrics assessed within the SA. There were no minor or significant negative descriptions identified for the site. This is compared to several of the sites which scored negatively within the Council's SA and yet were progressed to allocation, such as BDA2401, BDA2901, BDA0302, BDA0702, BDA1301, DS11A, DS11C, and DS12. This does not mean these sites should not be allocated, but it does confirm that there are sustainable sites available (such as Bristol Zoo Gardens) which have not been considered within the SA nor identified for allocation.
23. The evidence provided by BCWEZS provided in both sets of Reg 19 representations, including the SA undertaken, demonstrates that there are reasonable alternative sites for development which the Council has failed to consider and which could be allocated for residential development to provide certainty that they will contribute to meeting the shortfall.

Q2.3c: Is the Plan sufficiently proactive in seeking to maximise the delivery of residential development on appropriate sites, including those which may currently be in alternative uses (such as existing employment land)?

24. The Plan is not sufficiently proactive in maximising the delivery of residential development on appropriate sites. As set out above, the Council has failed to fully assess and allocate all suitable and deliverable sites, such as Bristol Zoo Gardens.

Q2.4: Further to the above, the response to PQ18 refers to sites suggested as part of the Regulation 19 consultation. This concludes that development is not ruled out by the local plan as they are not in any designations that would prejudice some form of development. Does this have any implications for the estimated capacity of the City, or the assumptions made relating to windfall or urban capacity?

25. As outlined under Q2.3a, the capacity of the City has not taken account of all of the sites that have been submitted for consideration as allocations, intentionally not allocating sites which benefit from unimplemented planning permission.
26. The Council's strategy is not considered a plan-led or proactive approach. It fails to assess or allocate all suitable sites at Plan-making stage, despite being unable to meet its own housing need. Instead, it is relying upon the development industry to progress sites with an unnecessary planning risk.

27. There is an over-reliance on extant planning permissions, ignoring wider challenges that may result in the need for the principle of development to be revisited through further planning applications. The 9,087 homes with planning permission quoted in the table of the Housing Need and Supply Topic Paper (April 2024) (TPC004) is 22.8% of total number of homes over the plan period, which equates to eight times the number of total homes which would come from proposed development allocations (2.8%). The Council's strategy places a minimal priority on allocating sites for residential development.
28. The Council's response to PQ18 states 'the potential future development of these 13 sites is not ruled out by the local plan'. This ignores the need for certainty and confidence in the planning position, which an allocation can significantly assist with, to encourage investors and developers to commit funds to bringing forward a site.
29. In a similar vein, 65.8% of the housing capacity falls within Areas of Growth and Regeneration, Small Site Windfalls and Urban Potential Sites. This is considered a significant proportion of the housing supply and, with limited confidence that these sites have been effectively planned for, or demonstrated to be deliverable, developable or available, it is imperative that sites such as Bristol Zoo Gardens are allocated to provide certainty to the Council's commitment to its delivery.

WORD COUNT: 1,963 words