

Examination into the Cheshire West and Chester Local Plan Part Two**Comments on behalf of North of England Zoological Society****Consultee ID: 243759****Matter 13 – GB and Countryside****Issue 1: Commercial sites policies GBC1, GBC1.A, GBC1.B, GBC1.C, GBC1.D, GBC1.E**

Q.2 How have the commercial sites in the GB been identified? How have the boundaries been defined? What is the justification for the use stated in each case? Are they justified? How have the site boundaries been defined? Generally, are the proposed allocations justified, effective and in accordance with national policy?

- 1.2.1 Chester Zoo is set within the Green Belt, covering a 97ha site which is located to the north east of the City, at Upton-by-Chester. Chester Zoo is operated by the North of England Zoological Society whom are a charity and a significant contributor to wildlife conservation, research and education projects around the world. The operating surplus made at Chester Zoo enable such projects to continue, which are wholly funded and made possible by the North of England Zoological Society.
- 1.2.2 Chester Zoo is one of the most well-known and well visited tourist attractions in the UK and is the most popular zoo in the country. Approximately 1.9 million people visit Chester Zoo each year and around 1,000 staff are employed at the Zoo. The Site therefore acts a key asset to the local visitor economy and makes a significant contribution to the economic success of the City of Chester, the Borough, and the wider region.
- 1.2.3 Safeguarding the contribution made by the Zoo to the local economy, wildlife conservation, research, and education should be a key focus of planning policy in Cheshire West and Chester. The North of England Zoological Society has plans to redevelop the Zoo over the plan period, which will help ensure excellent standards of animal welfare are maintained, safeguard its position as a principal tourist attraction, enhance the visitor experience, and improve the understanding of visitors of exhibited animals and their habitats. Owing to the Site's designation as Green Belt land, this can only be undertaken if the Site is recognised as a

Commercial Site as identified through the Part Two Local Plan. The Site's status within the Part Two Local Plan is therefore supported.

- 1.2.4 The Council's proposed boundary generally reflects the operational areas of the Zoo at the submission stage of the Part Two Local Plan. This includes Zoo exhibits, and visitor attraction areas, research and breeding centres, staff facilities, maintenance facilities, visitor car and coach parking areas, it also includes those areas originally approved for Zoological development through the Natural Vision Masterplan which was granted planning permission in November 2010 (See planning application reference 09/12057/FUL). The inclusion of land is integral to the functioning of the zoo and its continuing sustainable development.
- 1.2.5 This is illustrated by the recent grant of planning permission for a new Asiatic Lions exhibit (see planning application reference 18/00965/FUL) which is located within part of the previously approved Natural Vision Masterplan area, located to the north of the existing butterfly exhibit. Approved plans for this development are submitted as Appendix 1 to this Hearing Statement to provide context. These show the extent of the development beyond the core zoo area.
- 1.2.6 Whilst largely supportive of the boundaries outlined by the Council, the North of England Zoological Society requests that these boundaries are expanded to include the recently approved Animal Holding Area (see planning application reference 18/00202/FUL) which is to be located on land to the east of Caughall Road and completed Nature Reserve works (see planning application 16/02630/FUL).
- 1.2.7 Once completed, the Breeding Area will be integral to zoo operations providing an important off-show location for animal breeding, recovery and maintenance in support of and in common with the zoological function of the wider site. Submitted in Appendix 2 is the approved layout which illustrates how this site is to be developed now it has the benefit of planning permission. Development is scheduled to commence in November 2018.

- 1.2.8 The Nature Reserve area located to the north of the existing visitor car park forms a key part of the Zoo's ecological work. Approved plans for the Nature Reserve are submitted in Appendix 3.
- 1.2.9 The area defined by the Council also excludes the location of the Animal Supplies Division. As such the North of England Zoological Society request that this area is included within the boundary shown on the Council's proposed policies map.
- 1.2.10 In respect of the Local Plan, the North of England Zoological Society therefore requests that the boundary is expanded as shown in Appendix 4. The proposed revision to the Zoo's boundary only reflects those areas which are used and are integral to zoological operations and aligns with what has been granted planning permission by the Council.
- 1.2.11 The permitted use within the defined boundary of the site is "zoological purposes". This is later defined as including *"animal exhibits, animal enclosures (including non-exhibit animal care), front line staff facilities, car parking and access arrangements and guest/visitor services that are ancillary and related to the zoo's operational activities"*. The North of England Zoological Society has worked with the Council to arrive at this definition. Which is also relied upon by the Council as part of its assessment of the recent planning application described above. It is therefore wholly logical to amend the boundary of the Zoo to include those area which have been granted planning consent.
- 1.2.12 The definition of zoological purposes which is outlined within the Part Two Local Plan achieves the appropriate balance in ensuring the continued vibrancy of the Zoo whilst restricting land uses noting the site's Green Belt status. The land uses permitted by Policy GBC1 at Chester Zoo is therefore supported by the North of England Zoological Society.
- 1.2.13 The North of England Zoological Society is largely supportive of the broader requirements of Policy GBC1. The North of England Zoological Society accept the detracting affects that open storage may have on the wider open landscape should this not be sufficiently screened. As such, provided that account is taken of the wider character of the land and how it relates to existing features, the North of England Zoological Society has no objection to the requirement for landscaping/screening of open storage facilities.

1.2.14 The North of England Zoological Society does, however, question the justification and practicality of the requirement for landscaping for all development proposals at the Zoo. There is a wider range of development proposals which might come forward over the plan period, and whilst landscaping is likely to be relevant for some, there may be some circumstances where landscaping may not be required (such as changes of use). As such the North of England Zoological Society requests a minor change to the wording of this policy to include “*where relevant*” in reference to the requirement for landscaping to enable greater flexibility to account for the diversity of projects.

Q3. Is the detailed policy wording clear, justified, effective, and in accordance with national policy? In relation to GBC1.A, what is the justification for criterion 3, which refers to a supplementary planning document? Does criterion 6 accord with Paragraph 132-134 of the Framework?

1.3.1 The North of England Zoological Society welcomes the role and status given by Policy GBC1.A towards the Zoo’s Development Strategy in decision making. Developments at Chester Zoo are currently considered for consistency with the approved Natural Vision. This has included the delivery of major investments at Chester Zoo including the *Islands Project*. This has enabled the Zoo to maintain its position as a world class tourist attraction, enhancing the visitor experience, improving education and understanding of animals and their habitats, as well as the wellbeing and health of animals.

1.3.2 Given the role of Chester Zoo as a leader within the world for animal conservation, as well as the need for the Zoo to renew its identity during the plan period in order to continue to attract visitors, there is a need for the Zoo to adopt a long-term strategy for its future development. The adoption of this approach helps to inform and involve members of the community and key stakeholders in shaping the future development of the Zoo. It also gives the Council a clear steer as to how developments taking place at the Zoo fit into the overall long-term picture.

1.3.3 The acknowledgement and weight attributed towards the emerging Strategic Development Plan (as set out in Paragraph 7.8), is therefore welcomed and supported by the North of England Zoological Society. The Zoo is in the advanced stages of the preparation of this document. This document has been prepared by

the Zoo with close consultation with the local community. The document has now been discussed with the Council in advance of the Council's approval.

- 1.3.4 Criterion 3 of Policy GBC1.A requires the application of the Council's parking standards for developments at Chester Zoo. This is provided within the adopted Parking Standards SPD. Table 4.2 of this document sets out how parking standards are to be determined in accordance with land use and the type of development proposed.
- 1.3.5 Zoological development does not fall neatly within any type of development as defined under the Use Class Order and as such is considered as "sui generis". Included within Table 4.2 of the Parking Standards SPD are several examples of development types which set out how Sui Generis development might be treated through the Parking Standards SPD. Cited examples include Theatres, Motor Car Showrooms, Petrol Filling Stations and Stadiums with parking requirements determined proportionately to number of seats or area introduced by a development.
- 1.3.6 The North of England Zoological Society does not consider that cited examples of sui generis developments or the methodology outlined for car parking outlined for these examples are applicable to Chester Zoo.
- 1.3.7 Zoo developments do not result in direct increases in visitor numbers, rather it is the implementation of a long-term and multi-tiered strategy which seeks to achieve this.
- 1.3.8 The number of visitors to the Zoo does not correlate directly to the number of trips by car. This is due to a proportion of trips which will occur by coach and other forms of transport. The 2011 Green Travel Plan aims to reduce the number of trips made to the Zoo by car and is proactively implemented by the Zoo. This includes incentives for visitors to arrive by foot and bicycle which includes discounted park entry. Bike storage facilities, together with integrated public transport solutions also aim to encourage visitors to access the zoo via sustainable modes of transport. The Green Travel Plan also applies to staff and volunteers, with a reward scheme set in place for those accessing work by sustainable travels modes. There is also bike purchase and maintain schemes available, a car share scheme operates, and free

bus transport is offered for members of staff whom live in Chester and Ellesmere Port.

- 1.3.9 Zoological exhibits are typically large in scale by their nature given the need to ensure that there is sufficient space for the wellbeing of the animal which vary depending on the nature of that animal and its space requirements. As such, the number of visits made in relation to square footage of space created is significantly smaller than a stadium, arena, museum or theme park.
- 1.3.10 Owing to the above considerations, the North of England Zoological Society believe that parking requirements for the Zoo should instead be considered with reference to the type of development which is proposed, on how this relates to the Zoo's Strategic Development Plan in terms of overall visitor numbers. Not all developments which might occur at the Zoo will necessarily result in increased visitor numbers at the Zoo nor will the development of new or enhanced animal exhibits.
- 1.3.11 Instead, early dialog, transparency and flexibility will be critical for ensuring that the necessary to ensure that the right balance is achieved in arriving at the number of new car parking spaces required in association with any development proposal at the Zoo.
- 1.3.12 In response, the North of England Zoological Society request that criterion 3 regarding Parking Standards should be removed from Policy GBC1.A.