

SPECIAL LICENSING REGULATORY COMMITTEE

5th, 6<sup>th</sup> and 7<sup>th</sup> JULY, 2016

RECORD OF DECISION

Agenda Item No.7

5/8/16.  
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<u>Agenda Item No.</u>	<u>Decision</u>	<u>Timescale</u>	<u>Findings of Fact</u>	<u>Reason for Decision</u>
7 – Zoo Licensing Act 1981 (as amended) Zoo Licence for South Lakes Safari Zoo Ltd Compliance Report Regarding Current Licence Condition			<ul style="list-style-type: none"><li>• Mr David Stanley Gill's zoo licence was renewed on 8th June 2010 to operate a zoo at premises known as South Lakes Safari Zoo Ltd, Crossgates, Dalton-in-Furness, Cumbria, LA15 8JR.</li><li>• A special inspection was undertaken by Secretary of State Inspectors at the Zoo on 23th/24th and 25th May 2016 to check compliance with a number of conditions placed on the zoo licence at a Committee Meeting held on 23/24th February and 2nd March 2016.</li><li>• The inspectors produced three reports following the inspection:<ul style="list-style-type: none"><li>* <b>Report 1</b> Defra Inspection Report Form</li><li>* <b>Report 2</b> Special Inspection Ancillary report</li><li>* <b>Report 3</b> Assessment of ZLA Compliance during Special Inspection – 23rd to 25th May 2016</li></ul></li><li>• The Zoo received a copy of all three reports and were given the opportunity to make representations.</li><li>• The Zoo provided a response to the Reports and were considered by Members.</li><li>• Members noted the current condition on the licence and its compliance date but also noted that it had been elevated to a</li></ul>	
Condition No. 17 –	That the Committee note the position.	N/A		The Zoo had appealed the direction order dated 4th March 2016 and a hearing is

<p>Review of Veterinary Programme</p>			<p>Direction Order on 4<sup>th</sup> March, 2016.</p> <ul style="list-style-type: none"> <li>Ms Brewer informed Members that the appeal had been withdrawn or it was certainly the Zoo's intention to withdraw.</li> <li>Ms Swarbrick confirmed that was the case and added that it may have been lost in communication with Mr Walker, Solicitor who was acting on behalf of Mr Gill.</li> <li>In response to the above, Mr O'Donnell informed Members that there had been no formal withdrawal and requested that evidence be produced by the zoo to confirm the situation. Unless the case has been withdrawn at Court the case would proceed.</li> </ul>	<p>scheduled to take place on 14th July 2016 in Barrow Magistrates' Court. As a result this matter cannot be considered further at this time. However it will be brought back to Committee after the appeal has been determined.</p>
<p>Condition 18 – Delivery of Veterinary Services</p>	<p>That the Committee note the position</p>	<p>N/A</p>	<ul style="list-style-type: none"> <li>Members noted the current condition on the licence and its compliance date but also noted that it had been elevated to a Direction Order on 4<sup>th</sup> March, 2016.</li> <li>Ms Brewer informed Members that the appeal had been withdrawn or it was certainly the Zoo's intention to withdraw.</li> <li>Ms Swarbrick confirmed that was the case and added that it may have been lost in communication with Mr Walker, Solicitor who was acting on behalf of Mr Gill.</li> <li>In response to the above, Mr O'Donnell informed Members that there had been no formal withdrawal and requested that evidence be produced by the zoo to confirm the situation. Unless the case has been withdrawn at Court the case would proceed.</li> <li>Members noted the position with the condition and the appeal.</li> <li>Members noted the current condition on the licence and its</li> </ul>	<p>The Zoo had appealed the direction order and a hearing is scheduled to take place on 14th July 2016 in Barrow Magistrates' Court. Therefore this matter cannot be considered further at this time. However it will be brought back to Committee after the appeal has been determined.</p>
<p>Condition</p>	<p>That the Condition</p>	<p>N/A</p>		<p>Although the Zoo missed the deadline by</p>

<p>20(b) – Remove Muck Heap and Relocate</p>	<p>has been complied with and shall be removed from the licence.</p>		<p>compliance date of 1<sup>st</sup> May, 2016.</p> <ul style="list-style-type: none"> <li>On or around 14th May 2016 the Rhinos were moved to their new house by the main entrance.</li> <li>This allowed the muck to be taken from this house straight to a new storage facility that is secure and off show.</li> <li>Whilst some of the giraffe had moved from their old accommodation others did remain in the old giraffe house but their muck was now stored off show in the old car park.</li> <li>The condition has been complied with.</li> <li>The Zoo made no representations.</li> </ul>	<p>2 weeks, they had taken the necessary steps to comply with Condition 20(b).  The condition has been complied with and inspectors have confirmed this.</p>
<p>Condition 21 – Keep Public Walkways Safe</p>	<p>(a) That the Committee escalate Condition 21 and the Direction Order to a Zoo Closure Direction under s.6B(4) of the ZLA closing the following wooden walkways/platforms until the full conditions of the Direction Order have been met:- 1) Snow Leopard/Wolf Access Ramp 2) Anteater Viewing Platform</p>	<p>Immediate</p>	<ul style="list-style-type: none"> <li>Members noted the current condition on the licence and its compliance date but also noted that it had been elevated to a Direction Order on 18<sup>th</sup> December, 2015.</li> <li>The walkways had been a long standing issue at the Zoo with concerns being raised during Formal Inspections in 2009 and 2013 as well as Special Inspections in 2014 and most recently in November 2015.</li> <li>The condition was elevated to a Direction Order at a meeting of the Committee on 17<sup>th</sup> December 2015 because of non-compliance.</li> <li>The direction order required that all public wooden walkways and platforms be closed to the public until the direction order was revoked.</li> <li>At a meeting of the Committee on the 4<sup>th</sup> February 2016 Members decided to :</li> </ul>	<p>Compliance deadline for the direction order has now ended and there are three wooden walkways/platforms still in existence.  A direction order may not exceed a period of 2 years from the date of direction.  The most appropriate and proportionate course of action is to issue a zoo closure direction in these circumstances as this has no expiry period.</p>

<p>3) Duck Feeding Platform;</p> <p>The Committee note the effective date of the Order and that the Zoo recognised the need to comply with the original direction order before opening platform 1 above.</p>	<ul style="list-style-type: none"> <li>* Accept a report from the zoo compiled by RG Parkins and Partners Ltd that considered 2 out of an identified 7 elevated walkways and platforms;</li> <li>* Accept that 5 out of the identified 7 elevated walkways had been or were to be demolished and either remodelled or replaced;</li> <li>* Require an addendum to the report that the Zoo had completed the works specified by Parkins to ensure the remaining walkways were strengthened as directed and that other wooden structures being remodelled were suitable for that purpose;</li> <li>* Extend the time limit for compliance to 31st May 2016; and</li> <li>* Grant the Environmental Health Manager the delegated authority to authorise the walkways to open as and when the Zoo produced suitable evidence of the strengthening works being completed.</li> </ul> <ul style="list-style-type: none"> <li>• In the western end of the zoo, in the area known as the Worldwide Safari there were number of low level wooden walkways that served to level the pathway and make wheelchair access easier. It was said by Ms Brewer that these platforms were less than 300mm high and therefore R.G. Parkins had said they did not need to be surveyed.</li> <li>• On 10th February 2016 a telephone conversation took place between Adam Roberts of RG Parkins &amp; Partners Ltd and Richard Garnett, Environmental Health Officer. Mr Roberts stated that contrary to what was asserted by Ms Brewer RG Parkins did not inform South Lakes Safari Zoo that walkways less than 300mm are not deemed elevated. This was confirmed in an email exchange (10<sup>th</sup> February 2016 timed at 11.45).</li> <li>• On 22nd/23rd February and 2nd March 2016, the Committee instructed the Zoo to close every public wooden walkway/platform, regardless of its height above the ground, until the full terms of the Direction Order had been met.</li> </ul>	
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<p>Condition 23 – Firearms Cover and Protocol Regarding</p>	<p>(a) That Members note the Zoo's compliance; (b) That the condition should remain on</p>	<p>Annually by 1<sup>st</sup> April</p>	<ul style="list-style-type: none"> <li>• An update from Officers regarding compliance as seen during the May 2016 Special Inspection was noted by the Committee.</li> <li>• The deadline for compliance with the Direction Order was 31<sup>st</sup> May, 2016.</li> <li>• In a letter dated 16<sup>th</sup> June 2016 an update was provided by the Zoo.</li> <li>• Members noted that there were 3 public wooden walkways/platforms remained in placed: <ul style="list-style-type: none"> <li>1) Snow Leopard/Wolf Access Ramp;</li> <li>2) Anteater Viewing Platform; and</li> <li>3) Duck Feeding Platform.</li> </ul> </li> <li>• They were all closed to the public.</li> <li>• There were only plans to reopen the snow leopard/wolf access ramp.</li> <li>• Members discussed in full the issues regarding a Zoo Closure Notice but were assured that this was only part closure, not full closure of the Zoo.</li> <li>• Members considered 8.13 and 8.18 of the SSSMZP and Section 16B(4) of the Zoo Licensing Act during consideration of this matter.</li> <li>• The Zoo made no representations.</li> </ul>	<p>Inspector Telford has confirmed the Zoo's compliance with the condition.</p> <p>A breach of protocol was noted by the Inspectors during their inspection in May</p>
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Escapes	<p>the licence; and</p> <p>(c) That the condition remain on the Licence due to the Officer's recommendation and the recent breach of protocol noted at the inspection.</p>	<p>that the condition was complied with. However they stated:</p> <p><i>"At the inspection, the door to the room containing the gun cupboard was wide open, despite the protocol being that it should always be locked with entrance via a keypad code."</i></p> <ul style="list-style-type: none"> <li>• Council Officers reported this to Inspector Paul Telford of Cumbria Police who was due to revisit the zoo in early June 2016.</li> <li>• He agreed to investigate the concern raised by the Inspectors and advised Council Officers via email that both doors were secured at the time of his visit on 3rd June 2016.</li> <li>• He added that: <ul style="list-style-type: none"> <li><i>"I can only assume continued compliance with this practice. Agreement was reached to provide a proper gun cabinet for the dart gun and blowpipe in the Vet's room, moving both back to the cabinets in the Curator's building until this was completed."</i></li> </ul> </li> <li>• Inspector Telford also provided an update on general compliance with this condition concluding: <ul style="list-style-type: none"> <li><i>"In summary – the Zoo's approach to firearms provision has changed markedly from when I first became involved. It is my assessment that the Zoo is now compliant with Zoo Licence condition 23 (Annex Four). The relationship we have with the Zoo will continue."</i></li> </ul> </li> <li>• Insp. Telford's letter was appended to the Officer's report for Members' information.</li> <li>• Members recorded their displeasure of the recent breach of protocol.</li> <li>• The Zoo made no representations.</li> <li>• Members noted the current condition on the licence and its</li> </ul>	<p>2016.</p> <p>The condition had been complied with.</p>
Condition 28	(a) That the	Ongoing	

<p>– Perimeter Fence</p>	<p>Committee note that the Zoo had taken the necessary steps to comply with Condition 28; and (b) That the condition remains on the licence as it referred to ongoing maintenance of the perimeter fence.</p>	<p>compliance date of 22<sup>nd</sup> May, 2016.</p> <ul style="list-style-type: none"> <li>• The Zoo is surrounded by a wire fence topped by electrical wires.</li> <li>• Although a perimeter fence was meant to only deter entry or escapes, as large areas of the Zoo contained free roaming animals, such as lemurs, it was essential that the true perimeter fence remained small primate proof.</li> <li>• The inspectors stated after the May 2016 inspection in Report 1: <ul style="list-style-type: none"> <li>“Perimeter fence is primary barrier for free ranging species. Still has sections where vegetation not cut back or regrowing that could aid escape, and areas that need replacing.” (Q 2.3)</li> <li>“..... the issue of the perimeter fence as a primary barrier for free-ranging species has not been fully complied with (C28), although progress has been made.” (Q 8.1)</li> </ul> </li> <li>• In Report 3 they stated:- <ul style="list-style-type: none"> <li>“During the February licensing committee hearing the zoo informed the LA that a start had been made, and gave assurances that it would be completed. During interview at the May inspection DA acknowledged that this had not been completed. He informed the inspectors that an area of the perimeter fence needed replacing.</li> <li>Some areas of the perimeter fence were viewed. Whilst it is apparent efforts have been made to carry out the required work, where this has been carried out, it is already growing back (See photographs). In other areas there is no evidence of work having been undertaken, e.g. it the small area where the perimeter fence cuts back in towards the food preparation area. The perimeter fence that needs replacing has not been replaced.</li> <li>Both showing how where the overgrowth has been cut back, it is already returning.</li> <li>On interview DA reported that he was doing his best, but was short on man power. We gained the impression that he was doing much of this work himself. However DG informed us that he had put his full maintenance team</li> </ul> </li> </ul>	<p>Members noted that there had been a significant amount of growth over a short period which could aid escape.</p> <p>Because of the escape risk a period of sustained compliance is needed before the condition is removed.</p>
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<p>Condition 30 - Hamadrayas Baboon Indoor Accommodat ion</p>	<p>(a) That the Officer's recommendation be rejected; and (b) That the Condition remain on the licence and delegated authority be given to the Environmental Health Manager to remove the Condition once the insertion of adequate stop bars had been demonstrated.</p>	<p>7 days</p>	<p><i>onto the problem to resolve it. He was also of the opinion that it had been resolved."</i></p> <ul style="list-style-type: none"> <li>• The Zoo, in their submission of 17th June 2016 believed the condition to be complied with.</li> <li>• The Zoo was inspected on the 4th July 2016 to assess the work, and although extensive work had been carried out, the recommendation remained unchanged due to the ongoing nature of the condition.</li> </ul>	<p>To ensure that adequate stop bars had been inserted to prevent the escape of a Category 1 animal.</p>
			<ul style="list-style-type: none"> <li>• Members noted the current condition on the licence and its compliance date of 22<sup>nd</sup> May, 2016.</li> <li>• The baboons housed at the zoo had access to a large outdoor enclosure that they previously shared with the rhino and giraffe, before the rhino were moved.</li> <li>• However the indoor accommodation was not suitable. It was a bare box with a sloping floor meaning that it is higher at the front than at the back. There were no furnishings other than a single small screen, there was no climbing equipment, no enrichment items, no bedding or any other items to keep the baboons engaged or exercised.</li> <li>• This matter had previously been before Committee in 2014 but a condition was not added to the licence on that occasion.</li> <li>• At meeting of the Licensing Regulatory Committee on 23rd/24th February and 4th March 2016, the Zoo's Animal Manager acknowledged that the accommodation was in need of enrichment in the shorter term and new accommodation in the longer term.</li> <li>• At this hearing an agreement was made with the Zoo, which was subsequently accepted by Members that the Rhinos' new enclosure would be completed by 1st April 2016 and they would be moved the 3rd week in April 2016, following that the breeze</li> </ul>	



block wall can be built and the baboons transferred to this enclosure.

- At the time of the May inspection the inspectors had recorded the condition as not complied with
- Mr Gill stated during the May 2016 inspection that there was 'no way' the baboon accommodation would have been completed as required but despite the Zoo's Management having agreed to the date. No correspondence was ever received by the Council to inform Officers that there was to be a delay.
- Members noted that Condition 34 on the Zoo's licence required that plans for any new or remodelled accommodation for Category 1 animals must be sanctioned by a suitably qualified person and submitted to the Licensing Authority prior to the accommodation being built.
- No plans had been seen or submitted; indeed the Animal Manager was unaware of any plans actually existing.
- The Zoo, in their submission of 17th June 2016 believed the condition to be complied with.
- The Zoo was inspected on the 4th July 2016 to assess the work.
- Following inspection, it was confirmed by Officers and Matthew Brash that the Baboon House was completed with the exception of inadequate "Stop Bars" which needed to be replaced before the condition was removed from the licence.
- Currently, the door could open to up to 8 inches, which could aid escape.
- Ms Brewer had agreed to carry out the necessary work and stated that a welder was coming onsite to undertake the works.

Condition 31 – Shelters in Africa Field	(a) That the Committee note that the Condition had been complied with; and (b) That the Condition be removed from the Licence.	N/A	<ul style="list-style-type: none"> <li>Members noted the current condition on the licence and its compliance date of 22<sup>nd</sup> May, 2016.</li> <li>During the November 2015 Inspection the Zoo were heavily criticised for not having sufficient shelter and especially after 5 of an imported 6 Nyala died. Two Nyala had died in the days leading to the November 2015 inspection in association with a period of extreme wet and cold weather.</li> <li>The larger mammals have access to the house and Matt Brash accepted this as suitable.</li> <li>During the May 2016 inspection the Inspectors noted that the Zoo had moved birds onto the field without adequate shelter. However a shelter was being constructed on day 2 of the inspection.</li> <li>The Zoo, in their submission of 17th June 2016 believed the condition to be complied with however they did not mention that a written protocol had been produced and one had not been sent to the Council as required by the condition.</li> <li>The Zoo had been visited on 4<sup>th</sup> July, 2016 and the new shelter on the African Field for the birds was compliant and the condition deemed complied with.</li> </ul>	The condition had been complied with.
Condition 33 – Review of Diets and Nutrition	(a) That the Committee note that the Condition had been complied with; and (b) That the Condition be removed from the Licence.		<ul style="list-style-type: none"> <li>Members noted the current condition on the licence and its compliance date of 22<sup>nd</sup> May, 2016.</li> <li>During the May 2016 inspection, the Inspectors found that the diet sheets had been reviewed with input from the Zoo's Veterinary Consultant Mr Greenwood.</li> </ul>	The condition had been complied with and Inspectors had confirmed.
Condition 34	(a) That the Officer's	Immediate	<ul style="list-style-type: none"> <li>Members noted the current condition on the licence and its</li> </ul>	The zoo had failed to comply with the

<p>– Future Design of Enclosures</p>	<p>recommendation be accepted to escalate Condition 34 to a Direction Order for a period of 2 years to allow the Licensing Authority sufficient time to develop confidence in Zoo process regarding future design of enclosures; and (b) That the Committee reject the recommendation to request professional design drawings of the Baboon accommodation within 24 hours.</p>		<p>compliance timescale of immediate.</p> <ul style="list-style-type: none"> <li>• The purpose of the Condition was to ensure that when designing new enclosures for hazardous animals the keepers should not have to enter the enclosure with a Category 1 animal.</li> <li>• The plans for any such accommodation should be sanctioned by a suitably qualified person.</li> <li>• Hamadryas Baboons were categorized as a Category 1 animal under Appendix 12 of the SSSMZP.</li> <li>• At a meeting of the Licensing Regulatory Committee on 23rd/24th February and 2nd March 2016 the Zoo's Animal Manager acknowledged that the Baboon's accommodation was in need of enrichment in the shorter term and new accommodation in the longer term and agreement was reached that new accommodation would be completed by 22nd May 2016.</li> <li>• During the Inspection in May 2016, there had been very little work undertaken and the Animal Manager was unable to explain the design for the new baboon housing.</li> <li>• The inspectors were not shown any plans for the new accommodation even though construction had already begun.</li> <li>• The Zoo did comply with this condition when building the new rhino/giraffe housing in the Africa House.</li> <li>• Officers recommended that Condition 34 should be escalated to a Direction Order with an immediate compliance deadline. This Direction Order would take effect immediately as the works specified in it should normally be carried out by the zoo (as stated in section 16A).</li> </ul>	<p>condition in relation to the baboon enclosure. Section 16A of the ZLA states that non-compliance with a condition shall result in the service a direction order. The condition requires that the written documentation be forward to the Licensing Authority <u>before</u> the accommodation is occupied. The condition does not require the Zoo to submit professional design drawings.</p>
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<p>Condition 35 — Yellow Anaconda Exhibit</p>	<p>That Officer's recommendation be rejected and Condition No. 35 be removed from the Licence.</p>	<p>N/A</p>	<ul style="list-style-type: none"> <li>• In addition the Zoo should be asked to provide the Licensing Authority, within 24 hours, professional design drawings of the baboon enclosure that are signed off by a suitable qualified person.</li> <li>• Nick Jackson stated that it would be expected that any housing would have professionally drawn plans by an architect.</li> <li>• Members considered 2.2, 4.3 and 4.4 of the SSSMZP along with Section 1A(c)(i) of the ZLA during the decision making process.</li> <li>• Members noted the current condition on the licence and its immediate compliance date.</li> <li>• This condition comprises of two parts.</li> <li>• Part 1 had been completed in that the Anaconda had been removed off show.</li> <li>• In relation to the second part, this has not been complied with.</li> <li>• The Inspectors were shown that the anaconda had been removed to an enclosed vivarium and the pool now houses some terrapins.</li> <li>• The pond had not been filled in and had not been sealed off from the public. There area was however protected by a knee high bamboo barrier which the Inspectors noted as "sufficient".</li> <li>• Officers had recommended that Part 1 of the condition is complied with and this part of the condition could be removed from the licence.</li> <li>• Although the risk posed by the pond has been reduced, part 2 of the condition had not been complied with.</li> </ul>	<p>The Condition had been complied with.</p> <p>The Inspector's had deemed the barrier to the pond as sufficient.</p>
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<p>Condition 36 – Review of Public Feeding</p>	<p>(a) That the Committee note that the Zoo had taken the necessary steps to comply with Condition 36; and (b) That the condition be retained on the licence until the zoo could demonstrate a sustained period of compliance.</p>		<ul style="list-style-type: none"> <li>• Matthew Brash informed the Committee and the Zoo at the meeting that a UVB light should be provided for the terrapins in the pond.</li> <li>• In response to the above, Karen Brewer informed the Committee that Matthew Brash's comments had been taken on board and that 2 Keepers had recently been on a UVB light course and they would be tasked to implement the necessary UVB lighting across the Zoo.</li> <li>• Members noted that the Inspector's had deemed the barrier to the pond as sufficient.</li> <li>• The Committee considered Appendix 6 – 6.14 of the SSSMZP during consideration of this item.</li> </ul>	
			<ul style="list-style-type: none"> <li>• Members noted the current condition on the licence and its immediate compliance date.</li> <li>• The Inspectors reviewed the Penguin Feeding and were satisfied that on the day of the inspection all participants were wearing gloves.</li> <li>• Members noted that since the inspection a recent image had been posted on the Zoo's Facebook page showing a member of the public feeding a penguin without gloves.</li> <li>• A risk assessment for penguin feeding has been received.</li> <li>• With regard to the handling of raw meat by members of the public, this had been part of a paid for experience and was adequately controlled in terms of the use of gloves when handling the meat.</li> <li>• Members considered 1.5 and 1.10 of the SSSMZP during discussion of this item.</li> </ul>	<p>The condition has been complied and the inspectors have confirmed this however concerns remain that compliance has only recently been demonstrated and the Council needs evidence of sustained compliance due to the high risk of the transfer of zoonotic diseases.</p>

<p>Condition 38 – Review of Animal Bites</p>	<p>(a) That the condition remains on the licence and amended as follows:-  In accordance with Appendix 6, Paragraph 6.14 of the SSSMZP, a suitable and effective action plan to eliminate bites and injuries must be put in place, and a copy of this plan forwarded to the Licensing Authority;  (b) The Action Plan must be implemented fully and its effectiveness monitored; and  (c) In accordance with 8.14 of the SSSMZP, all contact injuries to visitors from animals must be reported to the Local Authority within 14 days.</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> <li>Members noted the current condition on the licence and its compliance date of 22<sup>nd</sup> May, 2016.</li> <li>The condition was applied following the November 2015 inspection.</li> <li>During the May 2016 inspection the inspectors noted that the key problem is lemur feeding. Even though a lot of work had been undertaken by the Zoo the risk remained. Even with a full complement of keepers there was no way that public feeding could be adequately controlled.</li> <li>Popcorn was still be sold and taken into the Lemur area.</li> <li>The inspectors observed a Cotton Topped Tamarin trying to steal food from a child in a pram. Despite being shooed away it remain persistent.</li> <li>The Inspectors have "..... Ongoing concerns over risk of bite injury from lemurs. Observed tamarin jumping onto child with popcorn." (Q 1.6).....Appropriate signage advising no feeding of animals (see Appendix 6 of SSSMZP) other than at designated feeding events are in place in the walk through areas, and feeding events (lemurs) are staffed (6 present at the observed event). However the public are still frequently disregarding instructions and direct contact remains such that there is a risk of injury or zoonosis". (Q8.12)</li> <li>The Zoo's comments were noted by Members</li> <li>Officer's recommended that Members review the wording of the condition in consultation with the Council's appointed veterinary advisor to enable non-compliance with the condition to be dealt with if an inadequate report or action plan is produced.</li> </ul>	<p>The Zoo has technically complied with the condition in that they have produced a written review and an action plan which has been forwarded to the Licensing Authority. However the inspectors have deemed the review as inadequate as it doesn't address the underlying issues concerning animal bites.</p>
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<p>Condition 39 - Management and Staffing Structure</p>	<p>(a) That Condition No. 39 be escalated to a Direction Order with a compliance deadline of 4<sup>th</sup> November, 2016; and (b) That the Direction Order would take effect after the statutory appeal period as the works</p>	<p>4<sup>th</sup> November, 2016</p>	<ul style="list-style-type: none"> <li>Revised wording for the condition was circulated to all parties on 7<sup>th</sup> July, 2016.</li> <li>Matthew Brash informed the Committee that it was important to note the work which had been done on this matter but there was an unmanageable expectation on the Keepers during the Lemur Feeding Experience when there were up to 300 people in the area.</li> <li>He also stated that there were now public feeding zones, the Zoo were still selling popcorn in the middle of the Zoo which didn't eliminate the problems.</li> <li>Nick Jackson informed the Committee that the Lemur Feeding Experience could be controlled by only allowing the people who had paid for the experience in the area – at the moment, it was a free-for-all. Ms Brewer nodded in agreement.</li> </ul>	
<p>PLEASE REFER TO AGENDA ITEM 6</p>			<p>The Zoo had failed to comply with the Condition. Section 16A of the ZLA states that non-compliance with a condition shall result in the service of a Direction Order.  Please refer to Agenda Item No.6, for more detailed reasons for decision.</p>	

	specified in it would not normally be carried out by the Zoo.			
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