

## HERITAGE STATEMENT

### 1. Site Details

Site Name:	St Monica's Home	Site Address:	St Monica's Home Cote Lane Westbury-On-Trym Bristol Avon BS9 3UN
NGR:	E: 357103, N: 176365		
Site Ref Number:	10187	Site Type: Macro	AC Upgrade

### 2. Pre-Application Check List

#### Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: After a phone call to the LPA it was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator?	Yes	
If no explain why: N/A		

#### Annual roll out consultation with LPA

Date of last annual rollout information/submission:	This information can be emailed to the LPA on request
Name of Contact:	See above
Summary of outcome/Main issues raised:	See above

#### Pre-application consultation with LPA

Date of written offer of pre-application consultation:	5th September 2016 & 15 <sup>th</sup> December 2020
Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	The Director of Planning
Summary of outcome/Main issues raised:	
No further comments (since the previous applications) have been received in respect to the proposals.	

## Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green		
Prior to the submission of this application the applicant initiates pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.			
Summary of outcome/Main issues raised: No responses had been received at the time of submission.			

## School/College

Location of site in relation to school/college: There are no schools in close proximity to the site.
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: N/A

## Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A		

## Developer's Notice

Copy of Site Provider Letter - Developer's Notice enclosed?	Yes	
Date served:	18 <sup>th</sup> December 2020	

### 3. Proposed Development

The proposed site:
<p><b><u>This application is a resubmission of 16/01719/F which was refused on 8/7/2016 due to a lack of drawing detail. This has been addressed in this new resubmission.</u></b></p> <p>The reasons for refusal of the previous application are highlighted below:</p> <p><i>The proposed development by virtue of a lack of information and inaccurate drawings fails to demonstrate that there would not be harm caused to the special interest of the listed building. The proposal is therefore contrary to Policy BCS22 'Conservation and the Historic Environment' of the Bristol Development Framework Core Strategy (June 2011) and Policy DM31 'Heritage Assets' of the Site Allocations and Development Management Policies (July 2014).</i></p>

Further drawings have been supplied which the applicant is confident will fully illustrate the proposal. The proposed site is an established telecommunication installation. This submission is purely to upgrade this existing installation with new AC equipment to facilitate improved performance for the existing telecoms equipment. The current roof equipment is being upgraded with minimal visual impact; indeed the visual implications of this upgrade are negligible. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. H3G and EE have a network sharing agreement and thus these installations are fully compliant with the NPPF.

Site Ref:	10187	Site Address:	St. Monica's House, Cote Lane, Bristol, BS9 3UN
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Local Planning Authority: Bristol City Council

Development Plan: Bristol Development Framework Core Strategy (2011) / Bristol Local Plan Site Allocations and Development Management Policies (2014)

Fig.1: CA Plan Extract (Reference Only):



Site and its surrounds

**Policy Relevant to the Development Site:**

The site is designated as being within the settlement boundary, with urban uses to the north, east, south, and west. The site is in the Downs Conservation Area and is a Grade II Listed Building. The designation is a material consideration.

Bristol City Council does have a specific telecoms policy, although Policy IF3 is relevant. This, together with the NPPF is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the NPPF.

## **Policy Analysis:**

Policy **DM31** states:

“General principles

Development that has an impact upon a heritage asset will be expected to conserve and, where appropriate, enhance the asset or its setting.

Conservation Areas:

Development within or which would affect the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.”

Policy **DM36** states:

“Telecommunications

Proposals for new or upgraded telecommunications equipment and installations will be permitted provided that:

- i. The telecommunications equipment and installation would respect the character and appearance of the area and would not be harmful to visual amenity by reason of its siting and design; and
- ii. Opportunities have been sought to share masts or sites with other providers; and
- iii. There are no suitable alternative sites for telecommunications development available in the locality including the erection of antennae on existing buildings or other structures; and
- iv. The proposal conforms to the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, taking account where appropriate of the cumulative impact of all operators equipment located on the mast / site.”

The proposed development at this existing site is required to deliver the requisite level of electronic communication service on a structure designed to accommodate multiple future users (so enable future site sharing opportunities), yet seeks to minimise its visual impact or change to the character of this location. Furthermore, the reversible nature of the works will ensure the integrity of the building maintained. The form and design of the proposed works would not appear out of context in this location, so according with wider Development Plan policy.

The public benefits of a greatly enhanced communications network for businesses, residents and visitors alike in this location would qualify only as less than substantial in terms of any perceived harm, and that harm is outweighed by the considerable positive that the development and its digital provision would contribute to the wider economic output of the area. The proposal fully accords with the requirements of the NPPF

Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56) of the National Planning Policy Framework. It states:

*“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.*

In keeping with the National Planning Policy Framework (NPPF). guidelines of using: “*high quality communications infrastructure*”, the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing built environment.

The presence of the roof top equipment sets a clear precedent for telecommunications development in this location and indicates that the principle of this proposal is acceptable in terms of siting. As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

The design of the proposed equipment is considered to be the least visually intrusive option available. Although it is accepted that there will be very marginally intensification in the amount of equipment it is felt that such a minor increase would not detract from the character of the area in which the proposal sits.

#### Listings Information:

Nurse's home for alms houses, now retirement home. c1925. By Sir George Oatley. For HH Wills. Squared, coursed Pennant rubble with limestone dressings, diagonally-set square ashlar cross-axial and central rear axial stacks and tiled cross gabled roof. Elizabethan revival style. Single-depth plan with end cross wings. 3 storeys and attic; 5-window range. A symmetrical front has projecting end gables with moulded coping and corner and central finials, 3-storey canted bays with paired cross windows to ground and first floors, and a 4-light mullion window beneath an ashlar parapet with finials to the merlons; central entrance of 2 semi-circular arches, wider to the middle, with half-glazed doors, windows as the bays, the central first-floor one divided by a fifth light, and a continuous range of mullioned attic windows beneath the overhanging eaves, 4:6:4 separated by blind panels; leaded metal casements. To the back of the right-hand gable is a square crenelated tower. INTERIOR: large entrance stair hall with rear stair flight. HISTORICAL NOTE: see St Monica's Rest Home (qv).

The Grade II Listed Building will not be affected by this minor proposal.

<b>Entry Name:</b> St Monica's Court, St Monica's Home of Rest	<b>Location:</b> Bristol, BS9
<b>Listing Date:</b> 24 February 1993	<b>County:</b> Bristol
<b>Grade:</b> II	<b>Electoral Ward/Division:</b> Westbury-on-Trym and Henleaze
<b>Source:</b> Historic England	<b>Built-Up Area:</b> Bristol
<b>Source ID:</b> 1282317	<b>Traditional County:</b> Gloucestershire
<b>English Heritage Legacy ID:</b> 379414	<b>Lieutenancy Area (Ceremonial County):</b> Bristol
	<b>Church of England Parish:</b> Westbury-on-Trym
	<b>Church of England Diocese:</b> Bristol

Enclose map showing the cell centre and adjoining cells:

This can be emailed to the LPA on request

Type of Structure	
Description:  Description: It is imperative to consider from a planning perspective that this is purely an upgrade to existing installation – The structure already exists.  Proposed 2No. outdoor units to be mounted on Flexi Foot supports on Roof of building. 2 No indoor units.	
Overall Height: N/A	
Height of existing building	23.2m AGL
Equipment Housing:	
Length:	
Width:	
Height:	
Materials	
Tower/mast etc – type of material and external colour:	N/A
Equipment housing – type of material and external colour:	N/A

Reasons for choice of design:
<p>Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56) of the National Planning Policy Framework. It states “Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.</p> <p>The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. EE Ltd is the new operating company which used to be T Mobile and Orange.</p> <p>In keeping with the National Planning Policy Framework (NPPF). guidelines of using “high quality communications infrastructure”, the proposed design has been selected to minimise visual impact upon the street scene and the Listed Building</p>

#### 4. Technical Information

ICNIRP Declaration attached	Yes	
ICNIRP public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.		
When determining compliance the emissions from all mobile phone		

network operators on the site are taken into account.		
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Frequency:	This information can be emailed to the LPA on request
Modulation characteristics <sup>1</sup>	As above
Power output (expressed in EIRP in dBW per carrier)  In order to minimise interference within its own network and with other radio networks, (EE Ltd) operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision  As part of (EE Ltd)'s network, the radio base station that is the subject of this application will be configured to operate in this way.	As above
Height of antenna (m above ground level)	N/A – AC unit upgrade only - See drawings

## 5. Technical Justification

Reason(s) why site required
<p>The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.</p> <p>The site is required to provide enhanced performance for EE Ltd &amp; H3G LTE via the implementation of improved AC Units.</p>

## 6. Site Selection Process – alternative sites considered and not chosen

Discounted Options
<p>In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground based installations are investigated.</p>

<sup>1</sup> The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation

The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application.

If no alternative site options have been investigated, please explain why:

This is an upgrade to existing sites thus no other standalone new facilities have been investigated. A new additional mast to facilitate the upgrade would not be in line with NPPF by upgrading the current facility the most sequentially preferable option has been progressed.

## 7. Additional Relevant Information

### Background to the Proposal

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However if this overlap is too great unacceptable interference is created between the two cells.

### **DEVELOPMENT PLAN POLICY.**

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, it is stated that:

*“Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise.”*

### **NATIONAL PLANNING POLICY**

PPG8 and PPS1 have been replaced by the National Planning Policy Framework (NPPF) (March 2012). This document condenses the advice outlined previously although the broad principles of promoting the expansion of electronic communication networks remain the same:



The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their accountable Councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role – contributing to building strong, responsive and competitive economy;
- Social Role – Supporting strong vibrant and healthy communities; and
- Environmental Role – Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes.

Paragraph 19 states that “The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system”.

It continues in Paragraph 20 to confirm Central Government advice that “To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century”. The following paragraph states “Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure”

Section 4 of the NPPF (Paragraph 29) encourages the “smarter use of technologies” to reduce the need to travel and promote sustainable transport methods in accordance with the central sustainable development thread which travels through the Framework.

The most pertinent section of the NPPF to the proposed development is that contained within Section 5: Supporting High Quality Communications Infrastructure.

There is recognition from Central Government in Paragraph 42 that “Advanced, high quality communications infrastructure is essential for sustainable economic growth” which will in turn play a vital role in developing provisions within the local community of both facilities and services.

Paragraph 43 identifies the need to “keep the number of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network”. In doing so, Central Government encourages the use of existing masts, buildings and other structures unless the need for a new site can be justified. Where such new sites are required, it is suggested that, where appropriate, equipment should be sympathetically designed and camouflaged.

Paragraph 45 defines the evidence that should be supplied to justify the proposed development. This should include:

- “The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; and
- for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or
- for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.”

Confirmation that Local planning authorities must determine applications on planning grounds is also contained in Paragraph 46. In determining applications, it is the contention of Central Government that LPAs should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission (ICNIRP) guidelines for public exposure.

Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56). It states, “Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.

In respect to good design, decision making should aim to ensure that any proposal deemed appropriate would “function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development” and “respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation”.

In determining planning applications “great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area”. Paragraph 63.

It is the intention of the NPPF that “Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal’s economic, social and environmental benefits)”. Paragraph 65.

Paragraph 66 clarifies that “Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably”.

## Conclusion

We consider that the development is compliant with the council's policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation.

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework and Local Plan Policies.

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## Contact Details

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Signed:	_____	Date:	19 <sup>th</sup> December 2020
Position:	Planning Manager	Company:	WHP
		(on behalf of above operator)	
	_____		_____