

**WARD:** Clifton Down

**SITE ADDRESS:** Telephone Exchange St Johns Road Clifton Bristol BS8 2EU

**APPLICATION NO:** 19/04167/F Full Planning

**DETERMINATION DEADLINE:** 17 December 2020

**Proposed installation 6no antennas on 3.5m high poles, 2no 0.3mm microwave dishes on the same poles, 3no equipment cabinets, 1no. additional meter cabinet and installation of ancillary equipment.**

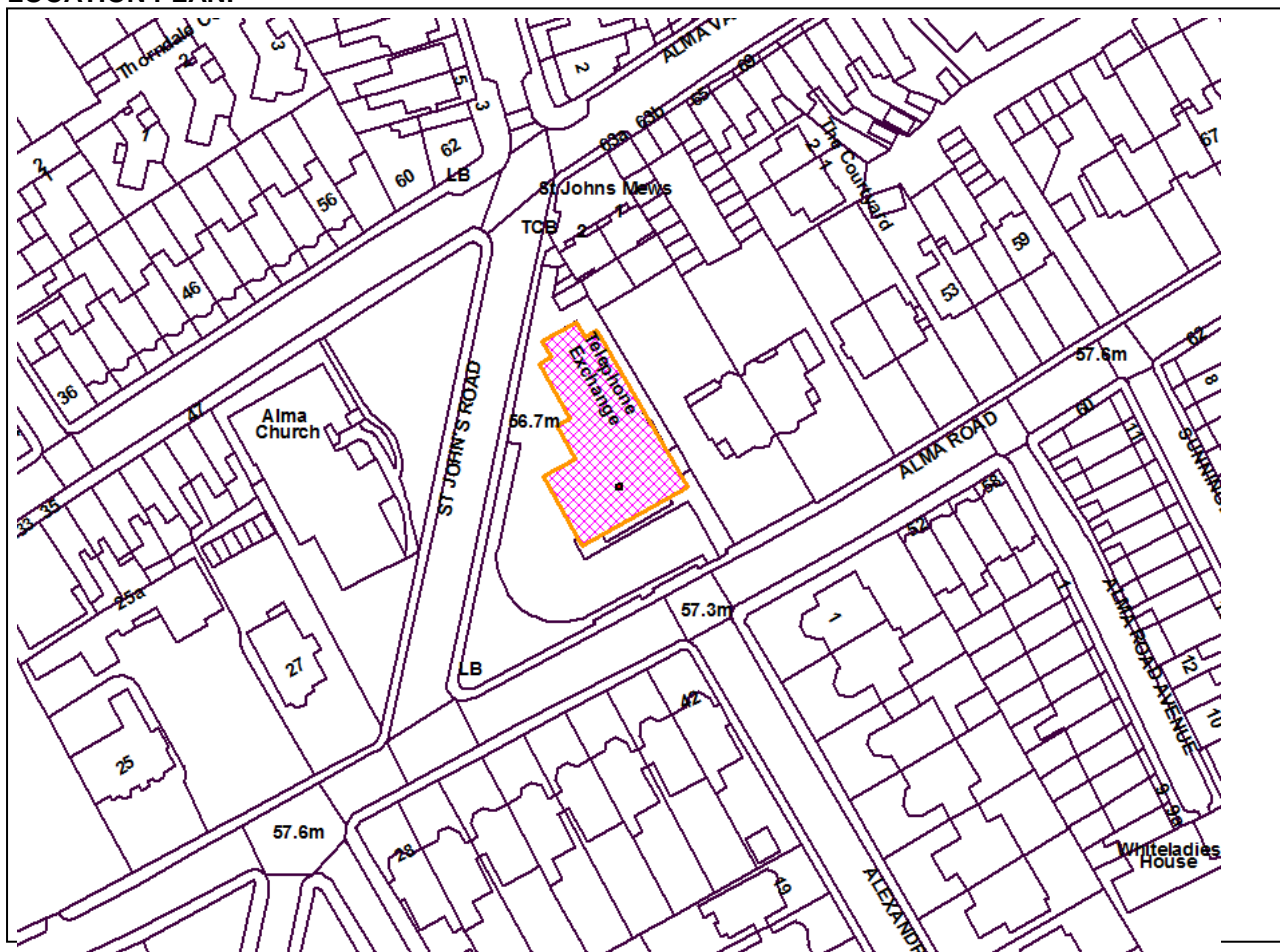
**RECOMMENDATION:** Grant subject to Condition(s)

**AGENT:** Sinclair Dalby  
Suite H, KBF House  
55 Victoria Road  
Burgess Hill  
RH15 9LH

**APPLICANT:** Vodafone Limited  
Vodafone House  
The Connection  
Newbury  
RG14 2FN

*The following plan is for illustrative purposes only, and cannot be guaranteed to be up to date.*

**LOCATION PLAN:**



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This application was referred to Development Control Committee by Cllr Clive Stevens, the reasons for the referral are included below:

*I am objecting to this on grounds of loss of visual amenity and harm to the look of a conservation area. There is a particular view (looking south down St Johns Road) where those traveling south by foot, bike or car will have this proposed structure take up an increasing large portion of the view straight ahead. It is framed by trees either side and the eye will be drawn towards it and the telephone exchange building below. It is worse because the 6 antennas look like they are to be situated on the North end of the building. This damage to the view starts north of the railway and just gets worse and worse as you progress down St Johns Road towards Alma Vale Road.*

*I am not objecting on health risk as this is not valid planning grounds.*

**SUMMARY**

The application seeks planning permission for an array of telecommunications equipment atop the Clifton BT Exchange building, within the Whiteladies Road Conservation Area. The primary motive for the application is to replace existing telecommunications equipment at Clifton Down Shopping Centre, which officers understand is planned for removal. This application would therefore ensure that 3G and 4G coverage in the area currently provided by the existing equipment is maintained.

Significant objection has been received from members of the public concerning, amongst other things, the proposal's impact on the Conservation Area, the principle of the location of the equipment, the proposal's need, the quality of the submission, and the health impacts of the proposal.

The submission provides clear and convincing justification for the location of the proposal in terms of Development Plan policy concerning telecommunications proposals. Specifically, it is not possible for the Applicant to share equipment/sites with other telecommunication providers, and alternative sites for the equipment are not available in the locality.

The health impacts of the proposal are considered to meet relevant planning policy and guidance thresholds, which largely refers to the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines.

Officers agree with members of the public and Cllr Stevens that the proposed equipment is at odds with the general character of the Conservation Area, predominantly as its appearance reflects its function. In terms of the impact of the experience of the Conservation Area, there would be limited short term views of the proposal when adjacent to the site; short-to-medium views from the west-side of Alma Vale Road; and of most concern short and medium-distance views from St John's Road.

Where officers' assessment departs from the majority of the comments received from members of the public, is with regard to the proposal's degree of harm to the Conservation Area, and also the perceived benefits of the proposal. It is officers' opinion, that the proposal represents a low degree of less than substantial harm to Conservation Area, and whilst great weight has been afforded to the Conservation Area's conservation, in this case the proposal's perceived benefit of ensuring consistent 3G and 4G coverage tips the balance in favour of approving this application.

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The application is therefore recommended for approval subject to conditions. Delegated authority is sought to prepare the draft conditions in consultation with the Applicant in line with the Town and Country Planning (Pre-commencement Conditions) Regulations 2018.

**SITE DESCRIPTION AND APPLICATION**

The site is addressed as the Clifton BT Exchange and is also known as the Telephone Exchange. BT operate telecommunications from the building, including Broadband. The site subject to this application is located on the northern side of St John's Road in Clifton. The current building is L-shaped and has a flat roof with a ranging height of 2 to 3 storeys. The site is within the Whiteladies Road Conservation Area.

The applicant is Vodafone Limited and according to the submission, they have a continued network improvement program, where there is a specific requirement for a radio base station at this location to maintain consistent and effective 3G and 4G coverage the Clifton and surrounding area. The submission goes on to explain that this application is necessitated as an existing Vodafone installation at Clifton Down Shopping Centre is to be removed and hence a new site is required.

The proposal includes the installation of 6No antennas on 3.5m high poles, 2No 0.3mm microwave dishes on the same poles, 3No equipment cabinets, 1No additional meter cabinet and installation of ancillary equipment on the rooftop of the building. The submission states that the existing building is 13 metres high, and the proposal would have a maximum height of 16.5 metres. All towers, masts and equipment housing will be finished in grey, with antennas finished in off-white. The application confirms that in all aspects of design, the smallest practical components have been utilised to minimise visual impact. The existing building already has some ancillary furniture on the roof, including a guard rail, AC units and a ladder.

The submitted Supporting Technical Information demonstrates that the proposal would mitigate any negative impact to coverage that would be incurred when Vodafone's equipment at Clifton Down Shopping Centre is removed. As well as this, Vodafone has confirmed that the proposed installation will also provide infrastructure capable of being upgraded for any future network demands of Vodafone.

The application confirms that the proposal would be configured to operate at radio frequency power outputs that are kept to the lowest levels commensurate with effective service provision. A ICNIRO Declaration has been submitted stating that the proposal is designed to be in full compliance with the requirements of the radio frequency (RF) guidelines of the ICNIRP for public exposure as expressed in the EU Council recommendation of July 1999. This ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present at, or near, the proposed location.

The application is supported by a 'Supplementary Information' document that contains general information relating to the proposal and the process in which Vodafone Limited has taken to reach this point. Such information is summarised below for information:

- Pre-application advice was sought in July 2019 but no response was received. Officers would approach this assertion cautiously, there is no pre-application enquiry logged on the Council's

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system, which would suggest that any enquiry from the applicant regarding this site was not submitted via the correct route.

- Cllr Denyer, Cllr Stevens, MP Thangam Debbonaire and Mama Bear's Day Nursery and Pre-School were notified of this proposal prior to the application being submitted, but it is reported that no response was received.
- The proposal is not within 3km of an aerodrome/airfield and the Civil Aviation Authority and the Secretary of State for Defence were not notified.

The Agent for the application is Sinclair Dalby Chartered Surveyors; the report refers to the Applicant and the Agent interchangeably as “the Applicant”. Over the course of the application, discussions have been ongoing with the Applicant, culminating in a Design Statement being submitted in July. This statement assesses if an alternative scheme could be designed that would have a lesser impact than the proposed development (a GRP shroud scheme). Further, a Photomontage Pack, which included a number of verified views to aid the Council's assessment of the proposal, was included as an appendix to the design statement. In response to these details, a period of 14 days consultation occurred to enable interested parties to review and comment on this information accordingly. Importantly, these details did not materially change the proposal's appearance. There is no relevant planning history that affects the assessment of this application.

**RESPONSE TO PUBLICITY - MEMBERS OF THE PUBLIC**

Nearby neighbours were notified by letter and the application was publicised by site and press notice.

In response to such consultation, 32 representations were received from 19 addresses; all representations were in objection, apart from a singular support comment. The support comment concerned the perceived benefits of ensuring the maintenance and improvement of essential services in Clifton, both from a personal and business standpoint. The objection comments are summarised below in the structure of the report:

*i Character and Appearance of the Area, including the Conservation Area (see Key Issues B and C)*

- The development would have a harmful impact on the Conservation Area
- The development would not be screened by trees
- The equipment would rise above nearby buildings
- The equipment would interrupt locally important views
- The equipment is not essential to the Conservation Area, hence any harm is unnecessary
- The equipment is close proximity to a nearby church
- The development would fail draft Policy DC3 of the Local Plan Review
- The equipment would make poor looking building worse
- The equipment would compete visually with church spires and domes
- Photomontage demonstrates that the apparatus would be unsightly and harmful to the Conservation Area – demonstrates an impact to a significant degree
- The photomontage is not a substitute for a site visit, as it fails to provide a fair and representative view of the proposed development in situ
- The photomontage only shows trees in full leaf



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- There is no demonstrated need:
  - The presented coverage charts are misleading as the coverage in the area is already good for indoor mobile reception. This is also confirmed in the Ofcom assessment of coverage for Vodafone in the area.
  - The proposed mast location moves away from the area of perceived "poor coverage" rather than into its centre (ie. in Redland).
  - The proposal would only result in a minimal improvement to coverage
- Alternative sites should be utilised:
  - Industrial and commercial alternatives should be used
  - The proposal fails to demonstrate alternative sites are available
  - Clifton Down Shopping Centre is more appropriate than the development site.
  - Why have no other operators affected by removal of equipment at Clifton Down Shopping Centre not been affected in the same way as the applicant?
- There is no evidence to indicate that the current site is the optimum coverage site, or that the installed equipment even needs to be replaced:
  - No evidence has been provided to demonstrate that a notice to quit has been served, suggesting there is no imminent threat to the existing site and equipment. Further, Vodafone enjoys rights to keep its existing apparatus - 1954 Act or the new Electronic Communications Code.
  - There are no public plans for the demolition of Clifton Down Shopping Centre
  - General commercial area of Whiteladies Road would be a more suitable location.
  - The search area is too small and skewed. Insufficient justification for the chosen search area, including its size, and why it is not centred on the existing equipment's location.
  - It is not possible to assess the extent of the coverage that would be provided by the new site as there is not a plan showing the existing site switched off.
  - A range of sites, including the nearby HSBC Bank and those in Whiteladies Road, have the potential to offer a better solution.
- The applicant is unclear as to if the removal of the existing equipment would cause temporary or permanent disruption. A condition could limit a temporary use.

*iii Perceived Health Impacts of the New Telecommunication Equipment (see Key Issue E)*

- Policy DM36 of the Local Plan requires proposal to minimise any risk to public health, this suggests that there is a risk to health; the Council should eliminate health risks rather than minimising them
- Perceived health issues associated with 3G, 4G and 5G technologies
- Specific concern as to long term health risks of radiation from the resident at no. 45 Alma Road – Public Health England suggests health effects from such technologies from the general population is unlikely, it does not consider the long term effects on someone living within close proximity
- Scientific evidence has not been able to rule out a risk to health and there are residents who would be exposed 24/7
- Tree surgeons would likely need to go within 3 metres of the equipment to maintain the trees of no. 45, this would result in a health and safety risk
- This application could be "...a back door route to using 5G" which could be harmful

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- Independent scientific resources available from groups such as 'Physicians Health Initiative for Radiation and Environment' should be reviewed
- Suggestion that the proposal will contribute to rumours concerning illnesses resulting from 5G

*iv Balancing Perceived Benefits Against Perceived Harm (see Key Issue F and H)*

- The preservation of the heritage asset is a factor which carries “great weight” irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (NPPF, para. 193). The applicant has not shown a clear and convincing technical case to justify this degree of harm (NPPF, para. 194). The public benefits do not outweigh the acknowledged harm to the Conservation Area, for example:
  - The site is a prominent corner of the Conservation Area, and is highly visible from surrounding residential properties and other communal open space
  - Development would only achieve a small improvement to existing coverage over a small area
- Suggestion that worsened network coverage would be preferable to the harm cause to the Conservation Area

*v Other Matters (see Key Issue G)*

- Perceived lack of consultation by letter from the Council
- Concern that received comments are from an address not in the vicinity of the development;
- The development would interrupt views from no. 45 Alma Road
- Objection on the grounds of factual inaccuracies within the application
- Without prejudice to the objections raised, if permission is granted, planning obligations should ensure: the site is not used for 5G services; the permission should not be used whilst the existing rooftop site (Clifton Down) is operational; and the existing equipment at Clifton Down shall be removed within 1 month of the permission becoming operational

**Cllr Clive Stevens made comments in objection due to perceived harm to the Conservation Area, comments quoted verbatim below:**

*I object to this as I believe it will harm the look of the conservation area. If you walk (cycle or drive) down St John's Rd straight ahead of you is this building. It is not too high but an eyesore none the less. But if you add 6 x 3.5m antennas on the north end of that building it will be really detrimental to the appearance of the immediate area. As you get closer it will be "in yer face" and amplify the look of what is an eyesore already.*

**RESPONSE TO PUBLICITY – INTERNAL CONSULTEES**

**Transport Development Management** has commented as follows:-

We have considered this application and have no objection to it.

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The proposed telecommunications will require a crane to lift the equipment on the roof of the building. The supporting supplementary information document (Received November 2019) outlines the potential impact of retained trees in Query 2 – Impact on trees surrounding the site. This recommends a crane survey prior to the start of the development.

Due to the potential impact of crane operations in close proximity to trees we require the crane survey to be undertaken prior to consent. The details necessary are:

- Size of crane, length, width, out rigger length, boom length and the rear counter weight radius.
- Crane positioning for lifting operations and boom radius in close proximity to the retained trees.
- Storage and lifting point for telecommunication equipment.

We also require an arboricultural method statement for any operation within the red line of the development that has the potential to cause impact damage to the retained trees. This would include:

Tree protection which includes protective fencing, stem protection and ground protection where heavy vehicles can cause compaction or distortion of the existing hard surfacing.

No arboricultural documentation has been provided and therefore we would require details of access facilitation pruning and any tree removal and retention.

*ii Final Comments:*

At present we have not received supporting arboricultural documentation, therefore can you add the following condition as a pre-commencement condition.

*Arboricultural Method Statement & Tree Protection Plan*

Prior to the commencement of the development hereby approved (including all preparatory work), a scheme for the protection of retained trees, in accordance with BS5837:2012, including a tree protection plan (TPP) and an arboricultural method statement (AMS) shall be submitted to and approved in writing by the Local Planning Authority.

Specific issues to be dealt with in the TPP and AMS:

- a Details of construction within the Root Protection Area (RPA) or that may impact on the retained trees.
- b A specification for protective fencing to safeguard trees and a plan indicating the alignment of the protective fencing.
- c A specification for scaffolding and ground protection within tree protection zones.
- d Tree protection during construction on a TPP
  - Construction activities within the RPA of retained trees.
  - Crane specification, with details of crane movements, siting and boom and counter weight restrictions during lifting operations.
- e Methodology and detailed assessment of canopy or root pruning.
- f Arboricultural supervision and inspection by a suitably qualified tree specialist.

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The development thereafter shall be implemented in strict accordance with approved details.

Reason: Required prior to commencement of development to satisfy the Local Planning Authority that the trees to be retained will not be damaged during demolition or construction and to protect and enhance the appearance and character of the site and locality, in accordance with DM17 and pursuant to section 197 of the Town and country planning Act 1990.

**City Design Group** has commented as follows:-

These comments represent the combined comments of the City Design Group, including expertise from officers specialising in: the urban landscape, urban design and conservation architecture.

*i Response to Initial Submission:*

The development would be visible from long views, such as St John's Road and Alexandra Road; these views are likely to be filtered through the trees on these streets, albeit tree-tree canopies cannot be relied upon throughout the whole year. In terms of short views of the building, the roof is unlikely to be visible due to perspective, and there may be limited and filtered views from medium distances. Overall, the development would likely result in a low/minimal degree of less than substantial harm to the Whiteladies Road Conservation Area. The Senior Conservation Architect has confirmed that the development would have no further impact on listed buildings.

*ii Response to Design Statement, including Views Montage/Assessment:*

No change to overall comments, the equipment is noticeable, but the proposal does not result in significant intrusion to how the area is experienced. Whilst there is support to finishing the equipment in grey as it will be a neutral colour that would aid the structure in receding in most light conditions, the exact colour should be confirmed by condition.

The views assessment covers all of the available views. In terms of methodology, the correct lens has been used. With regard to how the image of the structure has been modelled upon the building, the applicant claims that this has been done by measuring from detail drawings; whether this is the most accurate means of modelling now available may be open to debate, but officers advise if done honestly, the images provided would have been constructed level of care proportionate to the scope of the application.

**Pollution Control Team** has commented as follows:-

The application is accompanied by a Declaration of Conformity with ICNIRP Public Exposure Guidelines which states that the proposed equipment at this site 'is in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionising Radiation (ICNIRP), as expressed in EU Council recommendation of 12 July 1999 (1999/519/EDC)'.

According to Government guidance on Mobile phone base stations: radio waves and health found at <https://www.gov.uk/government/publications/mobile-phone-base-stations-radio-waves-and-health/mobile-phone-base-stations-radio-waves-and-health>

'Independent expert groups in the UK and at international level have examined the accumulated body of research evidence. Their conclusions support the view that health effects are unlikely to occur if exposures are below international guideline levels'.

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No objection is raised to this application.

**Nature Conservation Officer** has commented as follows:-

The following advisory note is recommended: All species of wild birds, their eggs, nests and chicks are legally protected until the young have fledged. If the installation of equipment is undertaken whilst birds are nesting, which is typically between 1st March and 30th September inclusive, then a check is recommended beforehand by a qualified ecological consultant. Where checks for nesting birds by a qualified ecological consultant are required they should be undertaken no more than 48 hours prior to works on buildings.

**RELEVANT POLICIES AND GUIDANCE**

- i National Planning Policy Framework – February 2019
- ii Planning Practice Guidance
- iii Bristol Local Plan comprising Core Strategy (Adopted June 2011),
- iv Site Allocations and Development Management Policies (Adopted July 2014)
- v Conservation Area Enhancement Statement 12. Whiteladies Road Conservation Area, 1993
- vi Policy Advice Note 15. Responding to Local Character – A Design Guide, 1998

In determining this application, the Local Planning Authority has had regard to all relevant policies of the Bristol Local Plan and relevant guidance (please note the above is not an exhaustive list).

The remaining report is arranged around the key issues relevant to the assessment of this planning application.

**(A) Principle of Development**

Policy DM36 'Telecommunications' is the key policy to be considered with regard to the application, and includes a presumption in favour of permitting new or upgraded telecommunications equipment and installations, 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 principle of the proposed equipment is acceptable, albeit the development must meet a number of criteria, including: visual appearance, the opportunity to share equipment/sites, the availability of alternative sites, and ICNIRP guidelines. These matters are discussed in full within the remaining report. Specifically:

- Key Issue B and C review the development's impact on visual amenity (criterion i), including the proposal's heritage impact;
- Key Issue D will consider criterion ii and iii;

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- Key Issue E will consider criterion iv;
- Key Issue F will consider the development's benefits in relation to the proposal's perceived heritage impact; and
- Key Issue G will consider outstanding issues not addressed by the other Key Issues, and Key Issue H will address the planning balance, and Key Issue I includes the recommendation.

When considering the proposal, Section 10 of the NPPF must be considered. This Section concerns high quality communications. Paragraph 112 requires decisions to support the expansion of electronic communications networks. Paragraph 113 supports the use of existing masts, buildings and other structures for new electronic communications capability. Paragraph 115 sets out a list of criteria that electronic communications development should evidence. The submission does provide evidence to meet the relevant criteria, and the development would use an existing building which is supported by the thrust of the paragraph.

**(B) Heritage Policy and Guidance**

The proposal is within the Whiteladies Road Conservation Area. Conservation areas are heritage assets. A 'heritage asset' is defined in the NPPF (Annex 2: Glossary) as: *"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."* 'Significance' is defined (also in Annex 2) as *"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting"*.

Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The Authority is also required (under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990) to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. The case of *R (Forge Field Society) v Sevenoaks DC* [2014] EWHC 1895 (Admin) ("*Forge Field*") has made it clear where there is harm to a listed building or a conservation area the decision maker "must give that harm considerable importance and weight." [48].

Section 16 of the national guidance within the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with any harm or loss requiring clear and convincing justification.

Paragraph 194 of the NPPF states that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Further, paragraph 195 states that where a proposed development will lead to substantial harm to or total loss of significance of a

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designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Paragraph 196 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

The Setting of a heritage asset is defined within the NPPF (Annex 2) as: *“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, and may affect the ability to appreciate that significance or may be neutral”*.

In addition, the adopted Bristol Core Strategy 2011, within Local Policy BCS22 of the Bristol Core Strategy (BCS) states that: *“Development will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including historic buildings both nationally and locally listed... and conservation areas.”* Policy DM31 of the SADMP requires that *“proposals affecting locally important heritage assets should ensure they are conserved having regard to their significance and the degree of harm or loss of significance”*. It goes on to state that: *“Conserving heritage assets: Where a proposal would affect the significance of a heritage asset, including a locally listed heritage asset, or its wider historic setting, the applicant will be expected to:*

- *Demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and*
- *Demonstrate that the works proposed are the minimum required to secure the long term use of the asset; and*
- *Demonstrate how those features of a heritage asset that contribute to its historical, archaeological, social, artistic or architectural interest will be retained; and*
- *Demonstrate how the local character of the area will be respected.”*

Further to this, there are also a range of design-related policies relevant to this development that all seek to achieve a high standard of urban design – Policies BCS21, DM26, DM27, DM28, DM29 and DM30. Further to these policies, the now dated Whiteladies Road Conservation Area Enhancement Statement (1993) is material to the assessment of the proposal in terms of heritage. Unsurprisingly, the Enhancement Statement is silent on telecommunication proposals. The Statement addresses the features of the Conservation Area that contribute to its significance. These predominantly include the series of irregular street grids, predominantly being composed of residential dwellings that are generally set back from the road behind medium-sized individual front gardens (one exception being Alma Vale Road). Further, the Statement suggests that a considerable extent of the Conservation Area *“...relies on the subtle combination of mainly domestic qualities: solidly built, substantial villas and terraces in local Brandon Hill, and Bathstone with interesting and varied elevational use of classical architectural motifs; well constructed boundary walls in local stone complementing the buildings and harmonising the ground level environment; attractive gardens; trees of good stature in streets and gardens”* (Page 45-46). The statement largely considers the key issues facing the Conservation Area to be those of: traffic and movement, both static and moving vehicles; the loss of retail uses in shopping frontages; and townscape issues, the statement highlights the importance of trees and front gardens.

### (C) Heritage and Design Assessment

The proposal is to locate the antennas on tripod mounts at the North-western edge of the building. The top of the antennas will be 3.5m above the roof level. The equipment cabinets will be mounted in the centre of the buildings and are unlikely to be visible from ground level views. In order to provide coverage the antennas must oversail the surrounding clutter and be located on a building of the same height as the surrounding buildings. The applicant suggests that the proposal represents a modest uplift in height that would not be a significant alteration to the appearance of the building or the area; and the development would not interrupt any existing views. Further, the applicant reports that the development would have less than substantial harm to the Conservation Area, but such harm would, in their opinion, be offset by the benefits that maintained connectivity in the area would provide. Further to this, the applicant states that:

*“It is not possible to provide coverage to the target area from outside the conservation area and the site selected is a building of no particular merit at the same height as its neighbours that interrupt no important sight lines”.*

Key Issue D discusses the siting of the equipment, and based on the information provided, concludes that applicant's assertion is reasonable; specifically that installation has to be in the Conservation Area in order to provide coverage to the target area. This is significant, as it suggests the equipment cannot be located outside of the Conservation Area, where it would likely have a lesser impact.

The design of the proposed equipment reflects its function and is not considered to preserve or enhance the character of the Conservation Area. The majority of the equipment will be finished in grey which will help to reduce its visual impact, a condition is recommended to ensure this. It is also important to consider that the equipment will not be seen in its entirety from one vantage point. The existing Telephone Exchange building is considered to have limited historic or architectural merit, and is composed of a series of connected predominantly three storey elements. The existing building therefore represents a more appropriate building to locate the equipment within this Conservation Area, than for example, buildings within the area of historic or architectural importance. The trees that provide generous screening to the western and southern boundaries of the site are considered to contribute positively to the character of the Conservation Area. Whilst officers appreciate that trees in the immediate area will affect the experience of views of the equipment, in some cases providing screening, officers have been careful to not rely on this in their assessment, largely as the trees' leaf coverage reduces significantly in autumn and winter months.

The assessment of how visually apparent the proposal would be is included below, this is necessary in order to assess the degree of harm the development's impact on the Conservation Area, as how visible the proposal is, and from where, affects the degree of harm the development represents. The proposal is supported by a Photomontage, and officers have visited the site and the surrounding area, to undertake their own assessment. The City Design Group has confirmed that the Photomontage addresses all of the available views, and considers the methodology to be acceptable for this proposal. Officers note criticism from members of the public in relation to the Photomontage, which largely concern the images being taken in the summer, rather than in the winter where tree cover would be limited. To provide the most representative picture of the proposal, it would be helpful for a views assessment to occur in both autumn/winter and spring/summer months. Nevertheless, officers advise that despite the omission of an autumn/winter assessment, there is sufficient information



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available to make a well-informed and sound decision as to the proposal's impact on the Conservation Area. Further, officers would advise interested parties, that the assessment of this application has benefited from visits to the site and surrounding area in late autumn, where trees were predominantly without their leaves.

Turning to the assessment of the proposal's visibility, the site sits on St John's Road between Alma Road to the south and Alma Vale Road to the north. Short range views of the proposal from the immediate area surrounding the site would be limited, largely as experience would suggest that when in the immediate of a three storey building; views would be drawn to the body of the building, rather than the proposed equipment on the roof. Members of the public have criticised the submitted Photomontage on the grounds of limited views from the immediate area adjacent to the site, but for the reasons discussed above, officers consider this omission to be acceptable.

Vantage points from St John's Road are likely to provide the clearest views of the proposal. Indeed, from the junction of Alma Vale Road, St Johns Road rises to the north, and as Cllr Steven's and members of the public have commented, when looking down St John's Road, clearer views of elements of the overall proposal would be achieved. For example, Images 2 and 3 of the Photomontage demonstrate that views would be achieved of the 6 antennas and their accompanying supports. The colour of the equipment combined with their relative slender profile does help to reduce the visual impact, as does other street scene and street scape features. Officers are aware that Images 3 a. and 3 b. have falsely changed the colour of the sky from presumably a blue, to grey, and this aids in reducing the visual apparentness of the equipment, officers would like to reassure interested parties, that officers' assessment has been adjusted accordingly.

The Photomontage does not include longer-range views from St John's Road, presumably as the proposal's equipment is likely to be at its most visible from where Images 2 and 3 are taken. However, officers have surveyed the site from further to the north of St John's Road, specifically from near the following junctions Whatley Road, Chantry Road and Beaufort Road. Long range views of the equipment would be possible, however the length of the distances combined with the street trees (even during winter months), would mean the proposed equipment would not be overly dominant or apparent when experiencing the Conservation Area as a pedestrian. It is true that proposed equipment would be more apparent for those driving down St John's Road, rather than pedestrians on the pavement, albeit these views would also be influenced by the street trees (at any time of the year), and such views do diminish with distance. To summarise, officers would advise that views of the proposal would be most visible, and thereby harmful, for a small but nevertheless important section of St John's Road, between the junctions of Alma Vale Road and All Saint's Road.

When walking from the west on Alma Vale Road, the existing building becomes visible just before the end of the terrace that includes the shopping frontage. From there, the proposed equipment would be very visible due to a break in street tree planting. This is clear from Image 1 of the Photomontage that provides a view from a pedestrian-perspective looking to the south east across the open grounds of Alma Church. However, from the visiting the site, it is relatively clear that where street trees are in situ, they would filter views, especially when approaching the junction with St John's Road, and this is irrespective of whether the trees are in leaf or not. From the eastern side of Alma Vale Road in relation to St John's Road and the site, views are unlikely, and this is reflected by Image 4 of the Photomontage.

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The development is less visible from the south. The Photomontage includes a view from the junction St John's Road and Alma Road, it is Image 8 within the body of the Photomontage Pack, but incorrectly labelled as Image 7 on the first page. From this position, the equipment would not be visible in the summer months due to tree cover, but would be more visible in the winter months, albeit such views would still be heavily disrupted by trees, and the bulk of the equipment is located further to the north of the existing building's roof (i.e. the antennas and their supports). These views would therefore have a minimal impact on the Conservation Area's setting, given they would be limited and disrupted glimpses only available in winter months. A similar conclusion is reached when viewing the development from the junction of Hanbury Road, Leigh Road and Alma Road. Images 6 and 7 of the Photomontage are views from Alexandra Road; these suggest the equipment would not be overly visible, largely due to its position on the roof toward the northern side of the building. Similarly, views from the junction of Alma Road and Alma Road Avenue would be unlikely. Overall, when viewing the site from the south, only in very limited positions would meaningful views of the equipment occur (largely from the junction of Alma Road and St John's Road). This is predominantly due to the position of the equipment on the roof of the building, and to a lesser degree, due to existing trees in the area that even without their leaves would filter views.

In summary, there would be limited short term views when adjacent to the site, short-to-medium views from the west-side of Alma Vale Road, and of most concern short and medium-distance views from St John's Road. These views would be of fairly unsightly equipment, which is not consistent with the wider character of the Conservation Area. Officers consider it necessary to consider policy DM31, which sets out a number of expectations for proposals that would affect the significance of a heritage asset. In such cases, the policy expects submissions to:

- i Demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and*
- ii Demonstrate that the works proposed are the minimum required to secure the long term use of the asset; and*
- iii Demonstrate how those features of a heritage asset that contribute to its historical, archaeological, social, artistic or architectural interest will be retained; and*
- iv Demonstrate how the local character of the area will be respected."*

In respect of criteria i, the Applicant has demonstrated that reasonable efforts have been made to mitigate the extent of the proposal's harm to the Conservation Area. For example, a GRP shroud was considered to screen the equipment, but this was considered to be more harmful than the proposal itself (see Appendix 3 of the Design Statement). Further, the more offending equipment is grouped, rather than spread across the whole the building, limiting its impact on the Conservation Area to predominantly St John's Road / Alma Vale Road area. Criteria ii is not relevant to this proposal; given the asset in question is the Conservation Area. In terms of the significance of the Conservation Area, the proposal is located on top of a building that is not considered to contribute positively to the historic or architectural significance of the Conservation Area. The proposal does introduce antennas and associated structures that are fairly unsightly, and not overly in-keeping with the character of the area. However, by nature of the proposal's siting and relatively limited impact on the experience of the Conservation Area (as discussed above), officers would advise that the features of the Conservation Area that contribute to its historical, archaeological, social, artistic or architectural interest will be retained (criteria iii). Nevertheless, officers cannot conclude that the proposed equipment respects the local character of the area, as expected by criteria iv. As such, officers advise that the proposal would

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result in limited harm to the significance of the Conservation Area, which is contrary to the expectations of policies BCS22 and DM31, including criteria i of policy DM36.

The City Design Group agrees with this assessment, but importantly considers that the development would likely result in a low degree of less than substantial harm to the Whiteladies Road Conservation Area. This is important, as whilst decision-takers must give that harm considerable importance and weight, the degree of negative weight to associate with the proposal's harmful impact on the Conservation Area, is influenced by the degree of harm.

As members are aware, when determining planning applications, decision-takers are required to determine application in accordance with adopted Development Plan policy, unless other material planning considerations indicate otherwise. In this case, officers do consider that other material planning considerations exist that must be taken into account, as whilst the proposal does not meet planning policy with regard to its heritage impact, the public benefits that would flow from the development must be considered – please see Key Issue F for this assessment.

Further to the Whiteladies Road Conservation Area, officers have also considered the proposal's impact on the adjacent Clifton and Hotwells Conservation Area, and consider that the development is unlikely to materially impact this heritage asset. The Council's Conservation Architect has advised that the proposal would not materially impact any listed building in the vicinity.

(D) Location of New Telecommunications Equipment

This Key Issue will consider criteria ii and iii of policy DM36, paragraphs 113, 114 and 115 of the NPPF.

*ii Opportunities have been sought to share masts or sites with other providers.*

When considering this criterion, it is vital to understand the coverage area for which the proposed equipment would serve, as this necessitates the area where the proposed equipment needs to be located in order to maintain existing network coverage, and hence the area in which alternative masts or sites could be used. The proposal is suggested to be required, as existing equipment at Clifton Down Shopping Centre is to be removed. The application submits within the 'Supplementary Information' document:

*"In relocating this site within the immediate area, existing network coverage and capacity will be maintained, and there will be no coverage loss to be incurred by network users. The closer the new site is to the existing site which is proposed to be removed, the more precisely the existing coverage will be replicated and it will avoid creating coverage gaps where none currently exist."* (Section 4).

This statement is reflected in the proposal's location, which is less than 200 metres to the south west of Clifton Down Shopping Centre. In response to officer requests, a map to demonstrate the search area was submitted (see appendices/supporting documents). Whilst this does appear fairly arbitrary, the Applicant has explained the methodology for the red circle on the maps. Specifically, that as explained above, the search area is largely determined by the coverage area of the existing equipment, as the proposal is to replace this. In this way, the red circle indicates that the search area is principally motivated by the need for the replacement equipment to be located close to the existing site, in order to prevent a loss of coverage within the network, given that the surrounding network has been designed around the existing equipment at the Shopping Centre. The search area map combined with the applicant's explanation, demonstrates that the search area is confined to the

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Whiteladies Road Conservation Area only, meaning it is not possible to locate the proposed equipment in a less architecturally and historically sensitive area (e.g. outside of the Conservation Area) without compromising coverage.

Turning to whether alternative sites or masts within the search area could be shared, the Applicant has confirmed that there are no existing masts within the search area, apart from at Clifton Down Shopping Centre. The Applicant supported this assertion with an extract from the web resource, 'Mast Data', which demonstrates there are no other existing applicable telecommunication installations in the relevant area, apart from those at the Shopping Centre. Indeed, from reviewing the planning record, it is clear that the Shopping Centre accommodates equipment operated by other providers to Vodafone. For example, in 2017, planning permission was granted to upgrade existing telecommunications equipment at the Shopping Centre (ref. 17/04972/F); the applicant in this case was MBNL, on behalf of Hutchinson 3G (Three) and Everything Everywhere (EE). Officers have asked the agent if, other to their own equipment at the Shopping Centre, is there any other equipment that could be shared, such as the equipment operated by Three and EE. The applicant responded to this query, stating that the Managing Agent representing the Landlord for the Shopping Centre, has confirmed that notices to quit have been served on all Telecoms Operators in occupation of the Shopping Centre. This is the limit of evidence provided to support the Applicant's assertion that the existing equipment at Clifton Down Shopping Centre will be removed in future. However, officers advise members that it should be taken 'as read' that the equipment will be removed, as officers have no evidence to suggest otherwise. Further to this, paragraph 116 states that local planning authorities must not question the need for an electronic communications system.

In accordance with paragraph 113 and 115 of the NPPF, the proposal utilises an existing building, and it has been demonstrated that existing sites and equipment cannot be shared to meet the coverage need. In summary, officers recommend that on balance, criteria ii of policy DM36 is met.

*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.*

The Applicant has followed the guidance within paragraph 115 of the NPPF so far as choosing to erect the antennas on an existing building, rather than proposing a new structure in itself. Turning to what type of building would be appropriate; the Supplementary Statement suggests that the height of the equipment needs to be as close to that of the existing masts on Clifton Down Shopping Centre: approximately 6 storeys. Further, the Applicant reports that the most suitable surface to mount the equipment is a flat roof, with sufficient load bearing capacity and structural integrity to enable the mounting equipment to be affixed without impacting on the stability of the structure. So in short, officers consider that a suitable building would need to be as close to 6 storeys in height with a flat roof of suitable structural integrity. The required location of the equipment has been discussed above, and officers understand that the equipment must be located in close proximity to the existing site in order to not detrimentally impact coverage.

Clifton Down Shopping Centre does not represent a suitable alternative site for telecommunications development available in the locality, as the applicant has informed officers the existing equipment will be removed in future. Specifically, the Applicant has advised that a Notice to Quit was served in 2018 with regard to the Applicant's equipment at the site, and their equipment only remains on the rooftop by rolling extension in order to hold off legal proceedings pending planning permission being granted for an alternative replacement site. Similarly, the Applicant advises that the Managing Agent representing the Landlord for the Shopping Centre has confirmed that notices have been served on all

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Telecoms Operators at the Shopping Centre. In terms of the future removal of Vodafone's equipment, the only evidence provided by the Applicant has been confirmation in writing that a Notice to Quit has been served on Vodafone requiring the existing equipment to be removed. Given comments from members of the public, a copy of the Notice to Quit was requested by officers, but it was not provided due to confidentiality. Nevertheless, the applicant/agent for the planning application is a Chartered Surveyor and Registered Valuer, and hence it would be unreasonable to not consider such information to be factually correct, especially when officers have no evidence to the contrary.

The Applicant has advised that if planning consent for a replacement site cannot be secured, then there is a risk that the coverage in this part of Bristol may be lost. Further, officers are aware of the instructions included within paragraph 116 of the NPPF, where local planning authorities are advised to not *"...question the need for an electronic communication system"*.

A member of the public has suggested that if permission is granted, planning obligations should be secured to ensure that the permission should not be used whilst the existing rooftop site (Clifton Down) is operational; and the existing equipment at Clifton Down Shopping Centre shall be removed within 1 month of the permission becoming operational. The PPG advises that planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms (paragraph 002, Ref. ID: 22b-002-20190901). Specifically, the paragraph states they must be:

- *necessary to make the development acceptable in planning terms;*
- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development.*

It is officers' opinion that the suggested planning obligations are not necessary to make the development acceptable in planning terms. For example, paragraph 116 warns local planning authorities to not question the need for an electronic communication system. Further, officers would advise that members should take it 'as read' that the removal of the equipment at Clifton Down Shopping Centre is expected, given the applicant's advice that a Notice to Quit has been served on Vodafone. It is also reasonable to conclude that it would not be economically advantageous for the Applicant to retain the installation at Clifton Down Shopping Centre, as the installations would be providing coverage to the same areas, especially as the submitted coverage maps suggest that the proposal would not provide an increased quality of 4G coverage compared to the existing situation.

The supporting information includes a number of rooftop sites within the search area that were investigated and discounted. These rooftop sites include: Tynedale Baptist Church, Canynge Hall and Clifton Down Station. These sites were discounted for a number of reasons, including: building height not being sufficient to provide coverage and the suitability of the existing rooftop to house the proposed equipment. A member of the public has suggested that the installation would be less incongruous if it was erected somewhere on Whiteladies Road. Officers understand this assertion, and have put this to the Applicant, identifying, for example, 40 Whiteladies Road and 44 – 52 Whiteladies Road as potential alternative sites given they are in the search area, are taller buildings within the area, and have flat roofs. In response to this, the applicant has discounted no. 40 Whiteladies Road, as whilst the roof is flat, the top floor is a penthouse apartment, meaning in order to install the equipment, it would be necessary for steelwork to be provided to penetrate the fabric of the residential accommodation. Further to this, access to the building would be needed in order to build and maintain the equipment. As such, the agent for the application has advised that this roof is not

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suitable for a commercial telecoms installation. The agent for the application has also discounted nos. 44-52 Whiteladies Road, as although the roof is flat, the buildings are of insufficient height as they are single storey. Further to these sites, a member of the public has suggested the HSBC Bank on Whiteladies Road at the corner of Redland Park Road, as it has a large, accessible flat roof. However, the Applicant has stated that this location is outside of the relevant search area, and fixing the equipment in this location would reduce coverage compared to the existing situation.

Without any evidence to the contrary, officers consider that the Applicant has demonstrated that within the search area, there are no suitable alternative sites for telecommunications development available in the locality, including the erection of antennae on existing buildings or other structures.

Regarding paragraph 114 of the NPPF, no evidence has been provided to suggest that the proposal would cause significant and irremediable interference with other electrical equipment (a), and criteria b is not relevant to the development.

Comments from members of the public question the development's proximity to existing residential development, however the NPPF is clear, in that local planning authorities should not impose a ban on new equipment, or insist on minimum distances between new electronic equipment and existing development (paragraph 114).

In summary, officers consider that on the basis of the provided information, the application meets criteria iii of policy DM36.

**(E) Health Issues and Residential Amenity**

Officers understand neighbours' concerns as to potential health impact from the development, and relevant planning policy and guidance exists to safeguard telecommunications impacts on health, for example, criteria iv of policy DM36 and paragraph 116 of the NPPF.

Criterion iv requires proposals to conform 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.

Similarly, paragraph 116 of the NPPF states: *Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.*

The application is supported by a letter from a Project Manager at Cornerstone with regard to the proposal, and confirms that the proposal is designed to be in full compliance with the requirements if the radio frequency public exposure guidelines of the ICNIRP. The letter goes on to state that the ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present at, or near, the proposed location. A comment from a neighbour questions whether the declaration takes into account the cumulative emissions of the equipment at Clifton Down Shopping Centre, the applicant responded to this by confirming the declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present at, or near, the proposed location.

The Pollution Control Team raised no objection to the development on health and safety grounds given the submission of the ICNIRP declaration and Government guidance.

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Officers note comments from members of the public concerning health impact of the development further than the ICNIRP declaration, including scenarios regarding works to nearby trees. The NPPF makes clear that local planning authorities should not set health safeguards different from the International Commission guidelines for public exposure. The applicant has demonstrated through the submission of an ICNIRP declaration that the proposal meets the health-related requirements as set out in planning policy and guidance. As such, officers recommend that no objections to this development should be held with regard to the proposal's health impact, given the development meets criterion iv of policy DM36 and paragraph 116 of the NPPF.

The proposal would not unacceptably prejudice the residential amenity of neighbours by nature of privacy, outlook or levels of light.

**(F) Public Benefits vs. Perceived Harm to the Conservation Area**

The proposal would result in limited harm to the significance of the Conservation Area, which is contrary to the expectations of policies BCS22 and DM31, including criteria i of policy DM36. Specifically, the City Design Group considers that the development would likely result in a low degree of less than substantial harm to the Whiteladies Road Conservation Area.

As required by paragraph 193 of the NPPF, great weight should be given to the Conservation Area's conservation, irrespective of the level of harm to its significance. Further, clear and convincing justification is required for any harm to the significance of the Conservation Area (paragraph 194). As per paragraph 196 of the NPPF, the harm posed to the Conservation Area by the development, must be weighed against proposal's benefits. The proposal would result in limited harm of a less than substantial nature to the Conservation Area. Whilst attributing great weight to the Conservation Area's conservation, clear and convincing justification has been provided, as per the expectations of criteria ii and iii of policy DM36.

When balancing the public benefits of a development against identified harm to a heritage asset, case law has made it clear that there is a strong presumption against planning permission being granted. This presumption is not just in planning policy and guidance, but also within the Planning (Listed Buildings and Conservation Areas) Act 1990. The presumption is therefore a statutory one. This is not to say, the presumption against approving is irrebuttable, it can be outweighed by material considerations powerful enough to do so. However, the local planning authority must when striking the balance between harm to a heritage asset on the one hand and planning benefits on the other, consciously consider the statutory presumption in favour of preservation, and this must be demonstrable in the balance.

Paragraph 112 of the NPPF considers high quality and reliable infrastructure to be essential to economic growth and social well-being. The paragraph continues, expecting planning decisions to support the expansion of electronic communication networks. The development is not the expansion of a network; rather it forms essential works to maintain an existing network. The Applicant advises that were the application refused, and the existing equipment removed at the Shopping Centre as planned, it is likely that high quality and reliable 3G and 4G coverage for the surrounding area would materially suffer, which paragraph 112 of the NPPF suggests would be to the detriment of economic growth and social well-being. Indeed, this loss of 4G coverage is evidenced by the submitted maps titled: 'Existing LTE 4G Coverage without [the Shopping Centre]' and 'Proposed LTE (4G) Coverage

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with the new site. Further, paragraph 113 highlights the need for electronic communications masts, and the sites for such installations, to be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.

Opportunities to share with other providers is not possible, and alternative sites for the equipment outside of the Conservation Area are not applicable. Hence, as encouraged by paragraph 113 and 115 of the NPPF, an existing building is being utilised, rather than a stand-alone structure which would likely cause more harm to the Conservation Area. The Applicant's submission does suggest that the proposal would form an installation necessary to ensure network coverage, in a manner that is consistent with the needs of consumers and the efficient operation of the network, to which positive weight should be attached.

Officers advise members, that the proposal would cause limited harm to the significance of the Conservation Area, and whilst great weight has been afforded to the Conservation Area's conservation, in this case the proposal's perceived benefits associated with ensuring consistent 3G and 4G coverage tips the balance in favour of approving this application. In undertaking this balancing exercise, officers have attributed considerable importance and weight to the protection of the affected heritage asset, and this has been weighed against the identified public benefits. In this circumstance, officers consider the presumption against planning permission being granted has been overridden in favour of the development which is desirable on the grounds of the discussed public benefits. The same conclusion is reached with regards to the referenced design and heritage related Development Plan policies. In summary, the motivation for this application is to replace an existing telecommunications installation at Clifton Down Shopping Centre in order to ensure 3G and 4G coverage is not diminished. The location of the existing equipment means the installation has to be within the Conservation Area, and officers advise that on the hierarchy of harm, the proposal is likely to pose the least harm to the Conservation Area, whilst maintaining 3G and 4G coverage.

Overall, officers advise members, that on balance, the proposal's harm to the significance of the Conservation Area is materially outweighed by the public benefits that would flow from this development. Given the proposal's harmful impact, a condition is recommended to require the equipment to be removed at the end of its operational life.

**(G) Other Issues****i Nature Conservation**

The Council's Nature Conservation Officer has advised an informative note be appended to the decision notice regarding birds nesting on the roof of the site. If the development is approved, the informative note will be added to the decision notice.

**ii Arboriculture**

The construction associated with the development has the potential to harm a number of on-site trees. The Council's Arboricultural Officer has advised that details of tree protection are required to ensure that those trees are not harmed. Officers therefore recommend that the condition suggested within the Arboricultural Officer's comments is applied.



**Development Control Committee B – 9 December 2020****Application No. 19/04167/F : Telephone Exchange St Johns Road Clifton Bristol BS8 2EU****iii The Generation of the Technology**

A number of comments from members of the public have expressed concerns as to the site being used for 5G technology. The submission suggests the equipment is capable of providing 3G and 4G coverage only, albeit the supporting documents confirms that the equipment would be capable of being upgraded in future. The Applicant has confirmed that it would be possible to upgrade the proposed equipment to provide 5G in future. To do so, the antennas would need revising, and given the context of the site and the different nature of the antennas, the Applicant advises a new planning application would likely be required. A member of the public has suggested that a condition should be imposed in the event of approval, to restrict the use of the site to provide 3G and 4G only, rather than 5G. Such a condition would be unnecessary, as the Local Planning Authority is assessing the proposed development, rather than the technology. Further, even if there was a planning reason to resist 5G technologies, which there is not, the Applicant's explanation suggests that a condition would not be necessary, given the likely requirement for planning permission.

**iv Equalities Impact Assessment**

During the determination of this application due regard has been given to the impact of this scheme in relation to the Equalities Act 2010 in terms of its impact upon key equalities protected characteristics. These characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Overall, it is considered that the approval of this application would not have any significant adverse impact upon different groups or implications for the Equalities Act 2010.

**v Community Infrastructure Levy**

Development of less than 100 square metres of new build that does not result in the creation of a new dwelling; development of buildings that people do not normally go into, and conversions of buildings in lawful use, are exempt from CIL. This application falls into one of these categories and therefore no CIL is payable.

**(H) Planning Balance**

Officers acknowledge that when reaching a recommendation for this application, a balanced judgement is needed and has been taken. For example, the proposal represents less than substantial harm to the Whiteladies Road Conservation Area. Against these negative aspects it is necessary to consider the public benefits that will flow from the development; and these are significant enough to outweigh this identified harm – see Key Issue F for full explanation of public benefits. As such, officers consider that on balance, the application should be granted planning permission, subject to conditions.

**(I) Recommendation****RECOMMENDED GRANT subject to condition(s)**

Delegated authority is sought to prepare the draft conditions in consultation with the Applicant in line with the Town and Country Planning (Pre-commencement Conditions) Regulations 2018. A summary of the likely conditions is included below, the list is not exhaustive.

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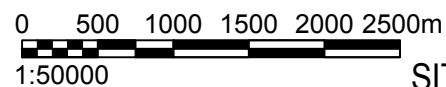
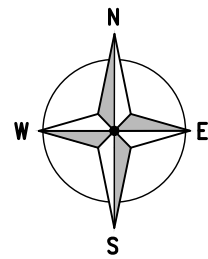
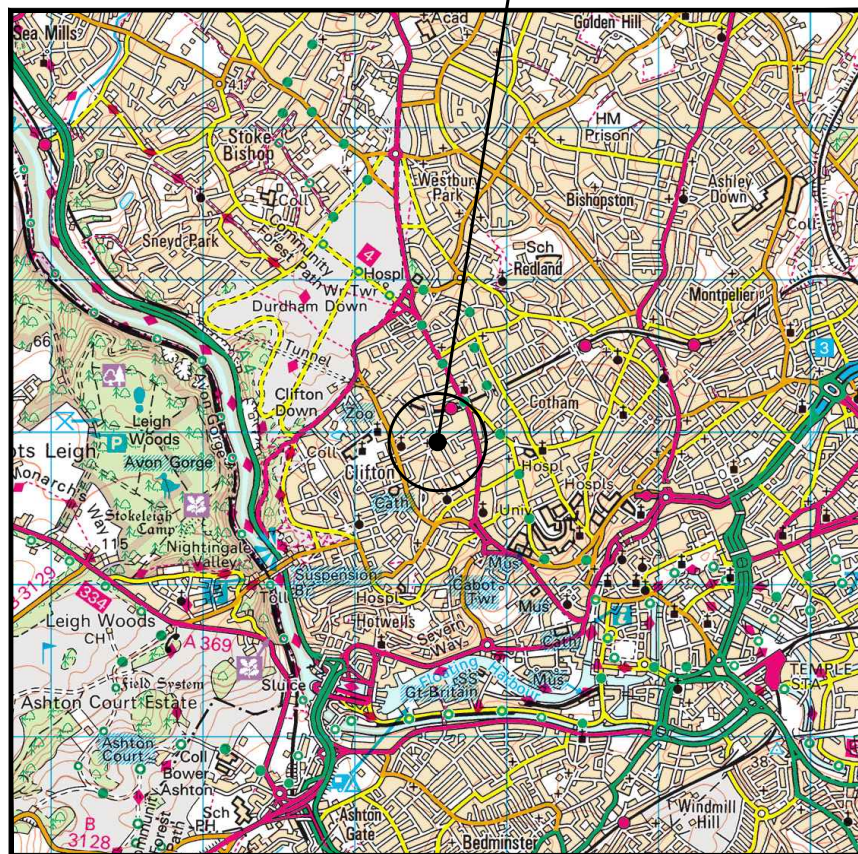
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- A condition to require the development to commence within 3 years of the date of permission.
- A condition to require the development to be carried out in accordance with the approved plans.
- A condition to require/ensure the colour(s) of the antennas, mounting poles/frames, cabinets and handrail are acceptable.
- A condition to require the submission of an Arboricultural Method Statement & Tree Protection Plan prior to the commencement of development, and the implementation of such measures thereafter.
- A condition to ensure the approved equipment is removed when it is no longer operational.

## **Supporting Documents**

### **2. Telephone Exchange, St Johns Road**

1. Site Location Plan
2. Proposed Site Plan, dwg no. 201 B
3. Proposed South West Elevation, dwg no. 301B
4. Proposed North West Elevation, dwg no. 303 A
5. Proposed South East Elevation, dwg no. 307 A
6. Proposed North East Elevation, dwg no. 305 A
7. Photomontage, Image 1 a. and b
8. Photomontage, Image 2 a. and b
9. Photomontage, Image 3 a. and b
10. Vodafone – Map of Search Area



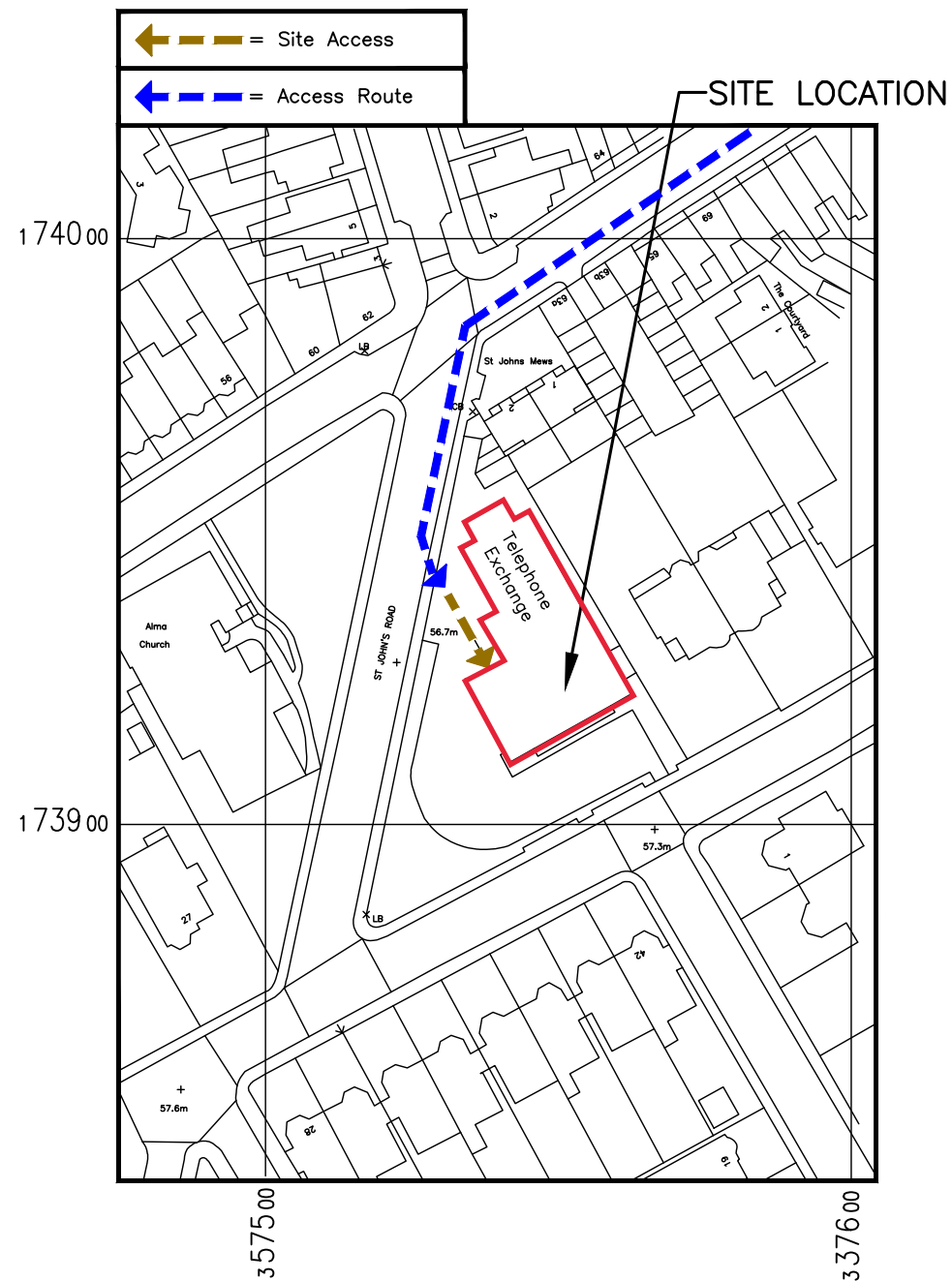
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(Scale 1:50000)

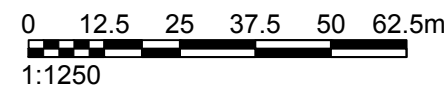
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based upon Landranger map series  
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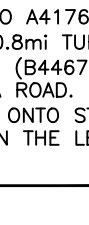



**The drawings comply with TEF & Vodafone Standard ICNIRP guidelines.**  
Designed in accordance with CTIL document: SDN0008

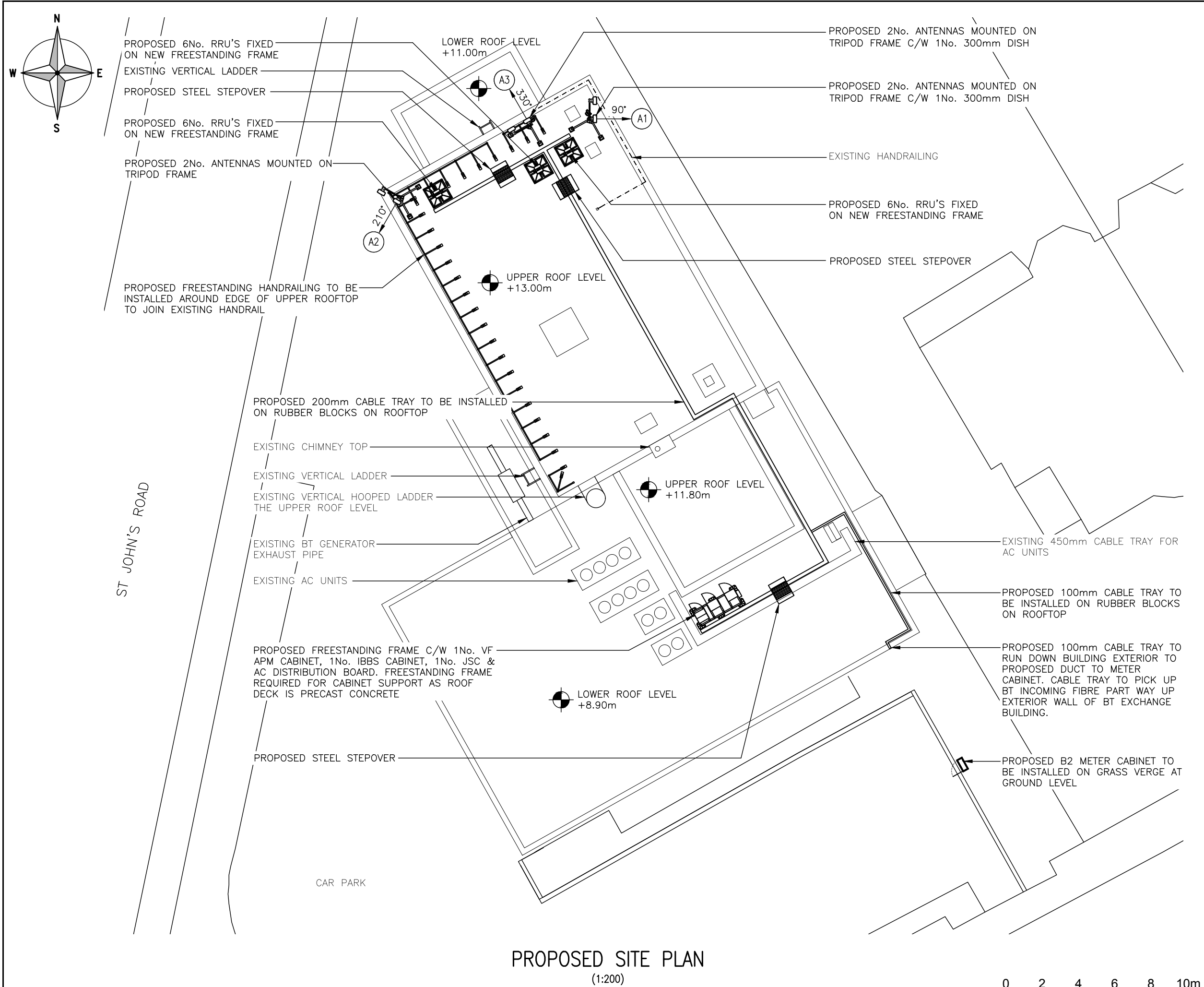


**DETAILED SITE LOCATION**  
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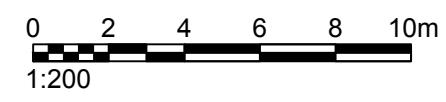
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N.G.R	E: 357550	N: 173926			
CONCESSION REQUIRED			NO		
DIRECTIONS TO SITE: HEADING NORTH ON M5 EXIT AT JUNCTION 18 TOWARD A4. AT THE ROUNDABOUT TAKE 2ND EXIT ONTO A4 AND FOLLOW FOR 4.8mi. TAKE SHARP LEFT ONTO A4176 (BRIDGE VALLEY ROAD) AFTER 0.8mi TURN RIGHT ONTO PEMBROKE ROAD (B4467). AFTER 0.4mi TURN LEFT ONTO ALMA ROAD. FOLLOW FOR 0.1mi AND TURN LEFT ONTO ST JOHN'S ROAD. SITE WILL BE ON THE LEFT HAND SIDE.					
NOTES:					
A	Issued for Approval		OG	RWB	21.03.19
REV	MODIFICATION		BY	CH	DATE
<div style="text-align: center;"> <b>GallifordTry</b> WOLVEY - HINCKLEY - LEICESTERSHIRE - LE10 3JF Tel: +44 (0)1455 222792 Fax: +44 (0)1455 222758</div>					
<div style="text-align: center;"> <b>vodafone</b> CTIL</div>					
Cell Name					Opt.
BT CLIFTON					-
Cell ID No					
CTIL		TEF		VF	
245080		-		17034	
Site Address / Contact Details					
CLIFTON BT EXCHANGE ST JOHN'S ROAD CLIFTON BRISTOL BS8 2ES					
Drawing Title: SITE LOCATION MAPS					
Purpose of issue: PLANNING					Dwg Rev:
Drawing Number: 100					A
Surveyed By: RB			Original Sheet Size: A3		Pack Issue:
Drawn: OG	Date: 21.03.19	Checked: RWB	Date: 21.03.19	B	





The drawings comply with TEF & Vodafone Standard ICNIRP guidelines.  
Designed in accordance with CTIL document: SDN0008

PROPOSED SITE PLAN  
(1:200)



ALL DIMENSIONS ARE IN mm UNLESS NOTED OTHERWISE

N.G.R

E: 357550

N: 173926

CONCESSION REQUIRED

NO

NOTES:

B	Cabinets Changed, Antennas Added	MF	RWB	17.06.19
A	Issued for Approval	OG	RWB	21.03.19
REV	MODIFICATION	BY	CH	DATE

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245080	-	17034

Site Address / Contact Details

CLIFTON BT EXCHANGE  
ST JOHN'S ROAD  
CLIFTON  
BRISTOL  
BS8 2ES

Drawing Title:  
PROPOSED SITE PLAN

Purpose of issue:		Dwg Rev:		
PLANNING				
Drawing Number:		B		
201				
Surveyed By:	Original Sheet Size:	Pack Issue:		
RB	A3			
Drawn:	Date:	Checked:	Date:	B
OG	21.03.19	RWB	21.03.19	

PROPOSED 6No. RRU'S FIXED  
ON NEW FREESTANDING FRAME

PROPOSED 2No. ANTENNAS MOUNTED ON  
TRIPOD FRAME C/W 1No. 300mm DISH

PROPOSED 6No. RRU'S FIXED  
ON NEW FREESTANDING FRAME

PROPOSED 2No. ANTENNAS MOUNTED ON  
TRIPOD FRAME

PROPOSED FREESTANDING HANDRAILING TO BE  
INSTALLED AROUND EDGE OF UPPER ROOFTOP  
TO JOIN EXISTING HANDRAIL

EXISTING HOOPED VERTICAL LADDER  
TO UPPER ROOFTOP

EXISTING CHIMNEY POT

PROPOSED FREESTANDING FRAME C/W 1No. VF  
APM CABINET, 1No. IBBS CABINET, 1No. JSC &  
AC DISTRIBUTION BOARD. FREESTANDING FRAME  
REQUIRED FOR CABINET SUPPORT AS ROOF  
DECK IS PRECAST CONCRETE

EXISTING PARAPET WALL

PROPOSED 100mm CABLE TRAY TO  
RUN DOWN BUILDING EXTERIOR TO  
PROPOSED DUCT TO METER  
CABINET. CABLE TRAY TO PICK UP  
BT INCOMING FIBRE PART WAY UP  
EXTERIOR WALL OF BT EXCHANGE  
BUILDING.

PROPOSED B2 METER CABINET TO  
BE INSTALLED ON GRASS VERGE AT  
GROUND LEVEL

TOP OF PROPOSED ANTENNAS  
+16.50m AGL

U/S OF PROPOSED ANTENNAS  
+14.50m AGL

UPPER ROOF LEVEL  
+13.00m AGL

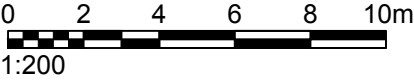
LOWER ROOF LEVEL  
+11.00m AGL

LOWER ROOF LEVEL  
+8.90m AGL

G.L.

PROPOSED SOUTH WEST ELEVATION  
(1:200)

The drawings comply with TEF & Vodafone Standard ICNIRP guidelines.  
Designed in accordance with CTIL document: SDN0008



ALL DIMENSIONS ARE IN mm UNLESS NOTED OTHERWISE

N.G.R | E: 357550 N: 173926

CONCESSION REQUIRED | NO

NOTES:

B	Cabinets Changed, Antennas Added	MF	RWB	17.06.19
A	Issued for Approval	OG	RWB	21.03.19

REV	MODIFICATION	BY	CH	DATE
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245080 | - | 17034

Site Address / Contact Details

CLIFTON BT EXCHANGE  
ST JOHN'S ROAD  
CLIFTON  
BRISTOL  
BS8 2ES

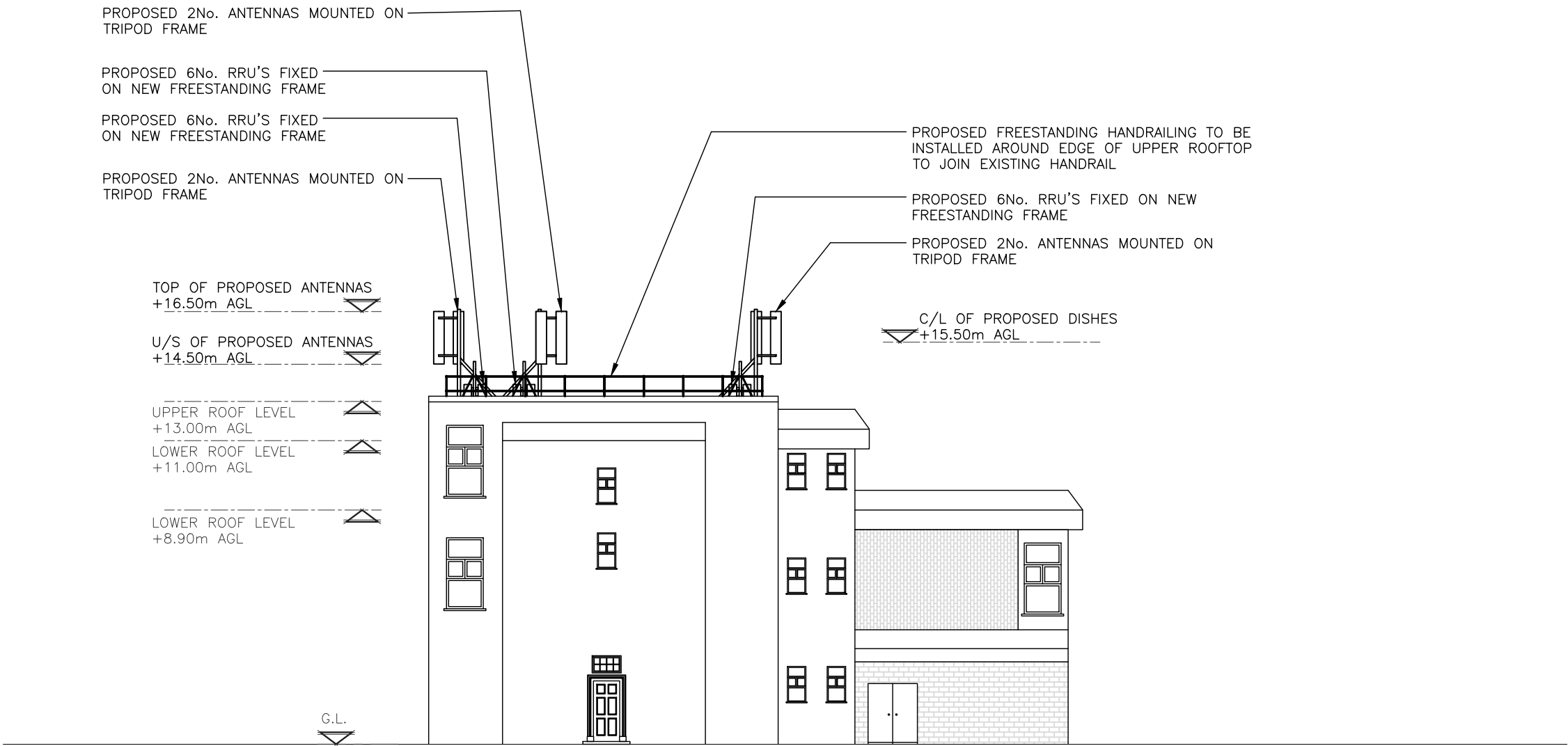
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PROPOSED SITE ELEVATION

Purpose of issue: | Dwg Rev:  
PLANNING |

Drawing Number: | B  
301 |

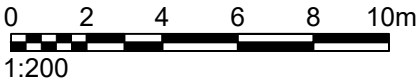
Surveyed By: | Original Sheet Size: | Pack Issue:  
RB | A3 |

Drawn: | Date: | Checked: | Date: |  
OG | 21.03.19 | RWB | 21.03.19 | B



PROPOSED NORTH WEST ELEVATION  
(1:200)

The drawings comply with TEF & Vodafone Standard ICNIRP guidelines.  
Designed in accordance with CTIL document: SDN0008



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N.G.R E: 357550 N: 173926

CONCESSION REQUIRED NO

NOTES:


A	Issued for Construction	MF	RWB	19.09.19
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REV	MODIFICATION	BY	CH	DATE
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Cell ID No

CTIL	TEF	VF
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Site Address / Contact Details

CLIFTON BT EXCHANGE  
ST JOHN'S ROAD  
CLIFTON  
BRISTOL  
BS8 2ES

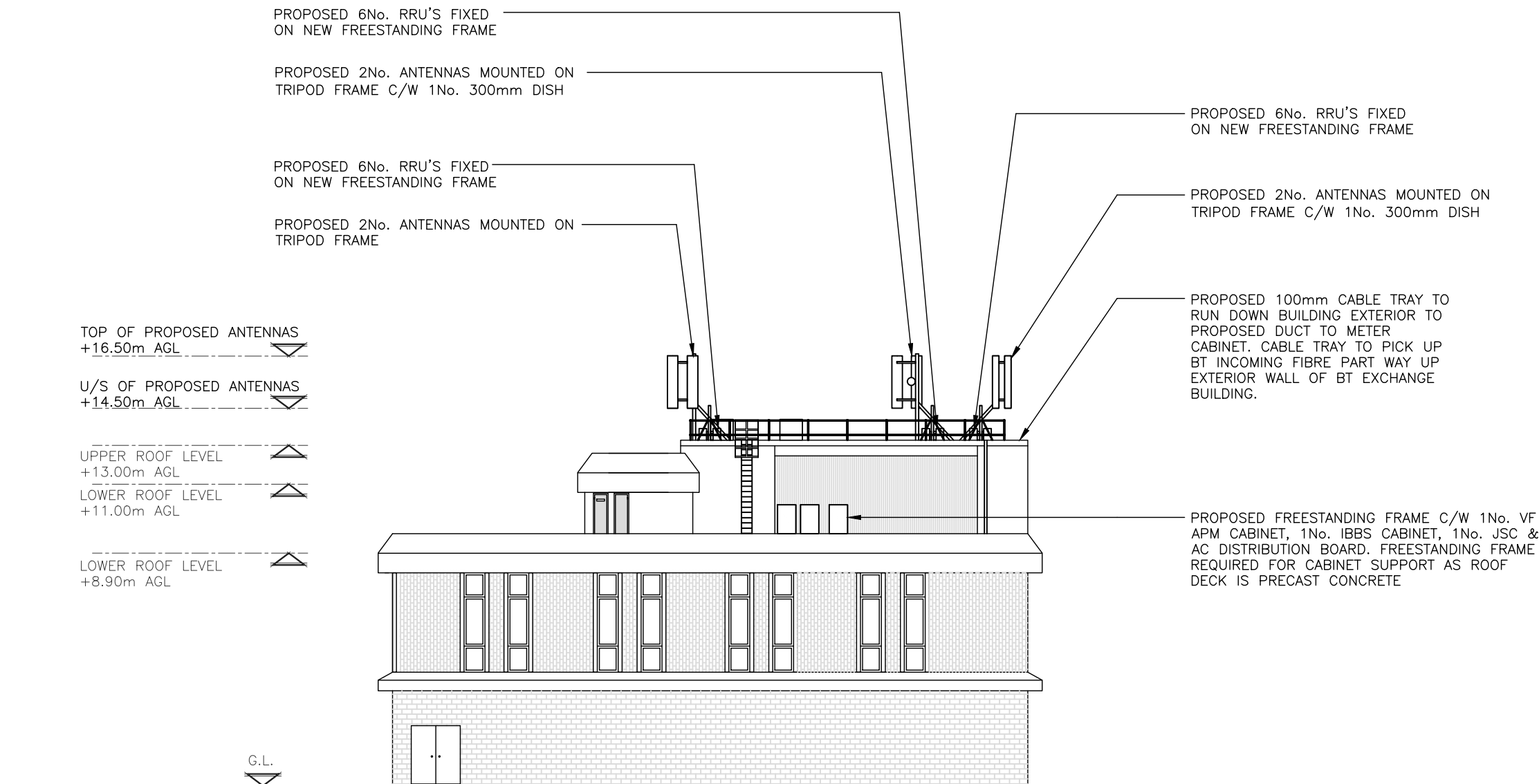
Drawing Title:  
PROPOSED SITE ELEVATION

Purpose of issue:	CONSTRUCTION	Dwg Rev:
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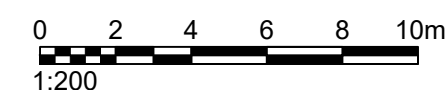
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Surveyed By:	RB	Original Sheet Size:	A3	Pack Issue:
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Drawn:	MF	Date:	09.08.19	Checked:	RWB	Date:	09.08.19	C
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PROPOSED SOUTH EAST ELEVATION  
(1:200)



The drawings comply with TEF & Vodafone Standard ICNIRP guidelines.  
Designed in accordance with CTIL document: SDN0008

ALL DIMENSIONS ARE IN mm UNLESS NOTED OTHERWISE

N.G.R

E: 357550


N: 173926

CONCESSION REQUIRED


NO

NOTES:

A	Issued for Construction	MF	RWB	19.09.19
REV	MODIFICATION	BY	CH	DATE



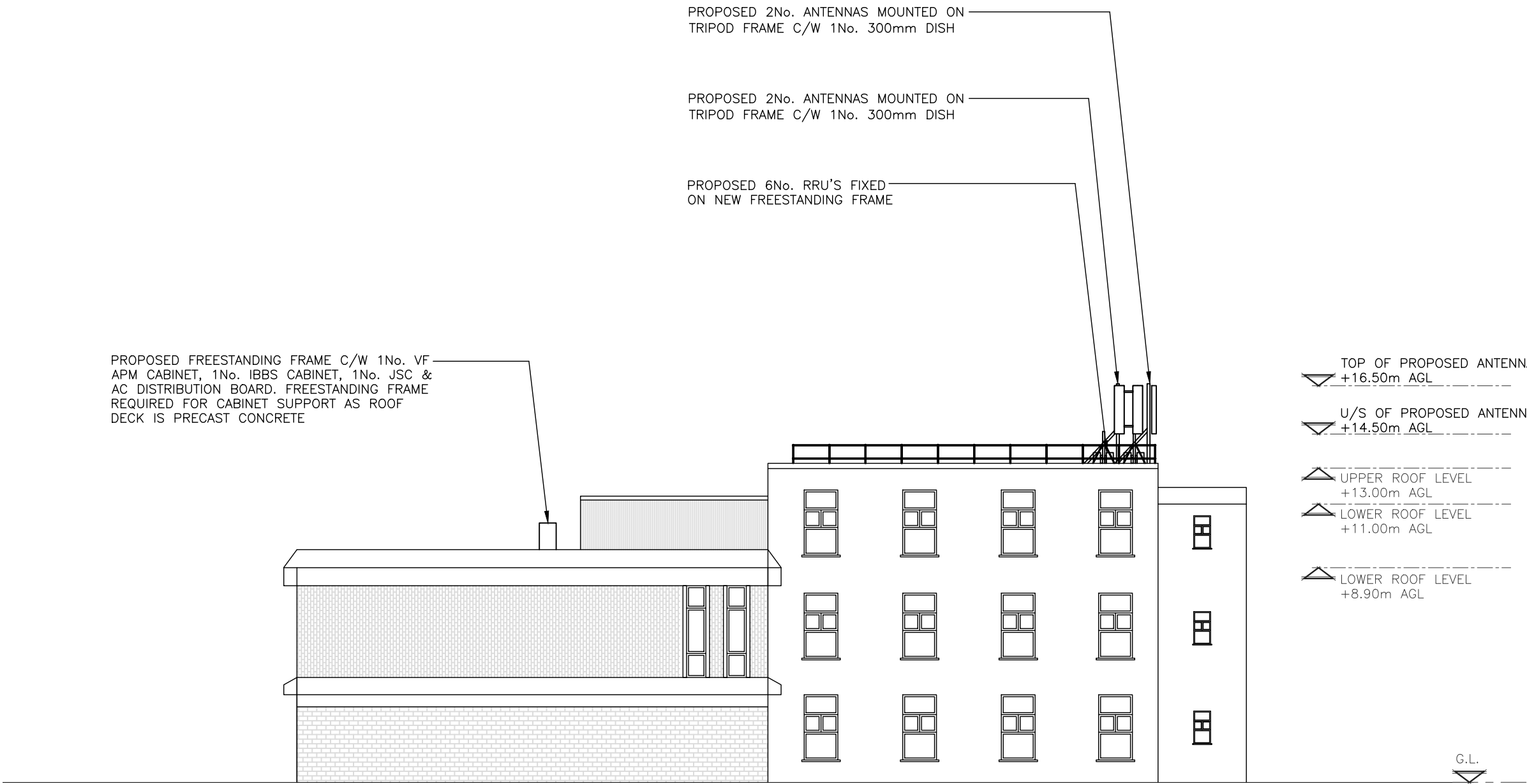
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Cell ID No		
CTIL	TEF	VF
245080	N/A	17034
Site Address / Contact Details		
CLIFTON BT EXCHANGE ST JOHN'S ROAD CLIFTON BRISTOL BS8 2ES		
Drawing Title: PROPOSED SE SITE ELEVATION		
Purpose of issue: CONSTRUCTION		Dwg Rev:
Drawing Number: 307		A
Surveyed By: RB	Original Sheet Size: A3	Pack Issue:
Drawn: MF	Date: 09.08.19	Checked: RWB
	Date: 09.08.19	C





PROPOSED NORTH EAST ELEVATION  
(1:200)

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Designed in accordance with CTIL document: SDN0008



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N.G.R | E: 357550 N: 173926

CONCESSION REQUIRED | NO

NOTES:

A Issued for Construction MF RWB 19.09.19

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245080 | N/A | 17034

Site Address / Contact Details

CLIFTON BT EXCHANGE  
ST JOHN'S ROAD  
CLIFTON  
BRISTOL  
BS8 2ES

Drawing Title:  
PROPOSED NE SITE ELEVATION

Purpose of issue:  
CONSTRUCTION | Dwg Rev:

Drawing Number:  
305 | A

Surveyed By:  
RB | Original Sheet Size:  
A3 | Pack Issue:

Drawn: MF | Date: 09.08.19 | Checked: RWB | Date: 09.08.19 | C





**Image 1a**  
Existing view from Alma Vale Rd looking East.



**Image 1b**  
Proposed view from Alma Vale Rd looking East.





**Image 2a**  
Existing view from St John's Rd looking South.



**Image 2b**  
Proposed view from St John's Rd looking South.





**Image 3a**  
Existing view from St John's Rd looking South.



**Image 3b**  
Proposed view from St John's Rd looking South.





## Vodafone - Map of Search Area

