

Cotham School, Cotham Lawn Road, Bristol, BS6 6DT

Planning and Heritage Statement for Cotham School
Our Ref: 23-01399
September 2024



1	INTRODUCTION.....	1
	Overview	1
	Submitted Plans and Documents	1
2	SITE DESCRIPTION.....	2
	Relevant Designations	3
	Planning History	3
3	PLANNING POLICY CONTEXT.....	4
	The Development Plan	4
	National Planning Policy Framework	4
	National Planning Policy Guidance	5
	Cotham School CCTV Policy	5
	Cotham School Data Protection Impact Assessment	6
4	THE PROPOSED DEVELOPMENT	8
5	NEED FOR PROPOSED DEVELOPMENT	11
6	KEY PLANNING CONSIDERATIONS.....	13
	Principle of Development	13
	Summary	15
	Ecology	16
	Neighbouring Amenity Impacts	16
	Design & Heritage Impact	17
7	THE PLANNING BALANCE.....	ERROR! BOOKMARK NOT DEFINED.

Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

Created by: James Newton BSc (Hons) MSc

Signature: James Newton BSc (Hons) MSc

Checked by: John Cocking MRTPI

Signature: John Cocking MRTPI

1 INTRODUCTION

Overview

1.1 This Planning & Heritage Supporting Statement has been prepared by Rapleys LLP on behalf of Cotham School. It supports an application that seeks consent to install 3no. fixed-position closed-circuit security cameras on top of 4m columns ("the cameras") within the grounds of Cotham School, Cotham Lawn Road, Bristol, BS6 6DT.

1.2 The formal description of development is therefore as follows:

Works to install 3no. CCTV poles and cameras.

1.3 The CCTV cameras are required by the School for pupil and staff safeguarding purposes and will extend the coverage of an existing system to include the boundary areas of the school playing fields.

1.4 The purpose of this Planning Supporting Statement is to provide information on Development Plan policy arena and assessment of compliance with such provisions therein.

Submitted Plans and Documents

1.5 In addition to this Planning Supporting Statement, the following documents and drawings comprise the full application package:

- Site Location Plan by Rapleys LLP
- Existing Site Plan by Rapleys LLP
- Proposed Site Plan by Rapleys LLP
- Camera Pole Elevation by Rapleys LLP
- CCTV System Survey & Feasibility Report
- CCTV Technical Specification Datasheet 1
- Ecological Note by CSA Environmental

2 SITE DESCRIPTION

- 2.1 Cotham School is located centrally between Cheltenham Road and Whiteladies Road, north of the city centre the University of Bristol, and south of the railway line between Redland and Clifton Down stations. The School is situated within the Cotham and Redland Conservation Area.
- 2.2 The School is located within a predominantly residential area with estate roads on 3 sides of an irregular site boundary. The School comprises the main building (locally listed and described in the Conservation Area Character Appraisal as 'a largely intact inter-war composition') together with a range of more modern additions resulting from significant refurbishment and extension over the last 20 years. This includes the recent development of a two-storey teaching block consisting of 12 classrooms within the former car park to the north of the site. The school itself is a comprehensive for 11 to 19-year-olds, with a total of over 1300 students (including 6th Form).
- 2.3 The application site comprises an area of the playing fields on the eastern portion of the site, adjacent to the fenced all weather and MUGA sports pitches. The playing fields stretch to the northern and eastern boundary of the site, which consists of fencing covered by trees and hedgerow. Residential properties surround the grounds beyond this, with some gardens backing on to the space. Within the grounds, the proposed location for the cameras is set out at Figure 3.



Figure 1: Cotham School Aerial View.

Relevant Designations

- The wider grounds are designated as an 'Important Open Space' (Policy BCS9 and DM17).
- The site is located within the Cotham and Redland Conservation Area.
- The site is located within Flood Zone 1 (lowest risk – no further assessment required).
- The main school building is Locally Listed.

Planning History

2.4 A search of the Council's Public Access records for the site reveals an extensive planning history. The following applications are considered of relevance:

- **08/03457/FB** – Extensive refurbishment and replacement of substandard accommodation through extension to the existing school with related landscape works – Approved 10th November 2008.
- **08/03458/LC** – Demolition works in connection with extensive refurbishment and replacement of substandard accommodation through extension to the existing school with related landscape works – Approved 1st December 2008.
- **10/03242/FB** – Installation of a temporary kitchen and dining block for use by the existing school (whilst the new permanent building works relating to application 08/03457/F are underway – Approved 11th October 2010.
- **10/03337/F** – Proposed construction of new MUGA (Multi-Use Games Area), fencing, associated landscaping – Approved 6th December 2010
- **14/06081/F** – 4 No. classroom extension, associated circulation space and staff office (existing changing facilities within internal courtyard of the school to be demolished) – Approved 5th February 2015.
- **16/01156/F** – Installation of an artificial all-weather playing surface on the school field, enclosed by 3m high fence – Approved 30th August 2016.
- **17/04367/FB** - rection of two storey building providing an additional 12 classrooms, dining and meeting rooms plus utilities. Repositioning of the all-weather pitch (which was approved under planning permission 16/01156/F) (Major Application) – Approved 22nd August 2017.
- **19/04638/X** - Application to vary condition No. 6 (Approval of road works necessary) attached to planning permission 17/04367/FB - Erection of two storey building providing an additional 12 classrooms, dining and meeting rooms plus utilities. Repositioning of the all-weather pitch (which was approved under planning permission 16/01156/F) (Major Application) - new proposed layout plan for pedestrian improvements (E17047-02). – Refused 28th July 2020.

3 PLANNING POLICY CONTEXT

The Development Plan

3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the Development Plan, unless material considerations indicate otherwise. In this instance, the following Development Plan documents and policies are considered relevant:

Bristol Core Strategy (June 2011)

- **Policy BCS9** Green Infrastructure
- **Policy BCS21** Quality Urban Design
- **Policy BCS22** Conservation and the Historic Environment

Site Allocations and Development Management DPD (July 2014)

- **Policy DM1** Presumption in favour of sustainable development
- **Policy DM5** Protection of Community Facilities
- **Policy DM14** The Health Impacts of Development
- **Policy DM17** Development Involving Existing Green Infrastructure
- **Policy DM26** Local Character and Distinctiveness
- **Policy DM27** Layout and Form
- **Policy DM31** Heritage Assets

Supplementary Planning Documents / Guidance

- Cotham and Redland Character Appraisal & Management Proposals (2011)

National Planning Policy Framework

3.2 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which councils can produce their own development plans. In addition to providing guidance for local planning authorities and decision-takers in the compilation of plans, the NPPF is also a material consideration in determining applications. A presumption in favour of sustainable development is at the centre of the NPPF.

3.3 On 6th March 2014 the Department for Communities and Local Government (DCLG) launched the National Planning Practice Guidance (NPPG), an online resource that seeks to provide more detail on how the policies in the NPPF should be applied. It is an evolving resource that is regularly updated.

3.4 The NPPF should be referred to as a whole, but the following chapters are of particular importance:

- **Chapter 8** Promoting healthy and safe communities
- **Chapter 16** Conserving and enhancing the historic environment

National Planning Policy Guidance

3.5 National Government provides guidance entitled “**Surveillance Camera Covert Practice: Owner/Installer Points to Consider**”.

3.6 The guidance produced in July 2015 identifies 12 guiding principles for CCTV installation and operation. These comprise:

- Specified purpose
- Effect on privacy
- Transparency in use
- Responsibility and accountability
- Clear rules policy and procedures
- Limitation of images and information to that which is strictly required for stated purpose
- Retained images and information restrictions
- Technical and competency standards met
- Appropriate security measures in place
- Effect review and audit
- Effective use to support public safety and law enforcement
- Reference database requirements

3.7 The applicant confirms that all above Government guidelines will be adhered to.

Cotham School CCTV Policy

3.8 The School’s CCTV Policy, approved by the School’s Governors, includes the following Statements:

***Para 1.8** The school’s CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1988. The use of CCTV and the associated images and any sound recordings, is covered by the Data Protection Act 1988. This policy outlines the school’s use of CCTV and how it complies with the Act.*

***Para 1.9** Notification of the system has been supplied to the Information Commissioners Office (ICO) on 16/01/2002 ...*

***Para 1.10** All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the IT Services Manager or Facilities Manager in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.*

Para 3.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

Para 5.1 Recorded data will not be retained for longer than is necessary. While retained the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

Para 5.2 All retained data will be stored securely.

Para 6.1 Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

Para 6.2 Except for law enforcement bodies, images will not be provided to third parties.

Cotham School Data Protection Impact Assessment

3.9 In addition to its CCTV policy, the School's DPIA, which is produced under guidance of external specialist consultants, reiterates that operating staff receive appropriate training to include the following:

- Legislation issues.
- Monitoring, handling, disclosing, storage, deletion of information.
- Disciplinary procedures.
- Incident procedures.
- Limits on system uses.

3.10 It confirms that operators receive ongoing training once a year, or sooner if requested. Furthermore, and particularly relevant to this application, the DPIA states that "we seek to maintain legitimate expectations of privacy by:

- 1) Directing cameras away from private property outside the school grounds.
- 2) Ensuring there are no covert cameras.
- 3) All camera locations are clearly visible and signage will give a clear warning that CCTV is in use.
- 4) Limiting the number of authorised staff who can access the system.
- 5) Automatically deleting footage after 30 days unless the data has been explicitly protected for a defined reason (an investigation).

3.11 The DPIA also confirms that "The CCTV system has been set up on a proper and legal basis and is compliant with the Data Protection Act 2018, The Human Rights Act and other legal requirements" and that "the system is reviewed annually to justify the need".

3.12 Finally, the DPIA states that “a new Data Impact Assessment would be carried out prior to commissioning any changes” to the system.

4 THE PROPOSED DEVELOPMENT

4.1 The proposal is to install 3no. fixed-position closed-circuit security cameras on top of 4m poles (“the cameras”). The location of the cameras has been carefully selected to provide coverage of the approach to the main building from the perimeter fields / grounds to enable the client to detect and observe activity in these areas.

4.2 The proposal is depicted in the manufacturer’s Data Specification Sheet & Camera Pole Elevation Ref. 23-00812-ELV01 submitted with the application. In summary:-

- Installation of three additional Avigilon Multi Sensor camera units (see Datasheet 1 – H5A Multi Camera), each with three internal camera modules mounted on wind-down CCTV columns (see proposed camera Location Plan – Figure 2).
- The 4m tall wind-down CCTV columns (Model AW1859) will require a concrete base (1.1m x 1.1m x 0.55m) to be constructed below the field surface to support each column and to provide cable entry into the column cabinet from beneath via a duct constructed within the base (see Figure 2).
- Galvanised steel column and tubular tilting pole to be finished in Moss Green (RAL No. 6006) to help column blend into the background.
- Cable run – There is an existing duct route running from the main school building across the school field to Cotham Lawn Road (shown in blue on Figure 2) which will accommodate the transmission cabling for the three additional cameras.
- The new cameras will be connected via the School’s IT network to the central recording servers, extended out to the new camera locations.

4.3 The design intent is to provide a much-needed security installation that would not be out of place with its surroundings. In terms of scale, it will have a negligible impact given the size of the overall playing fields and wider school site.

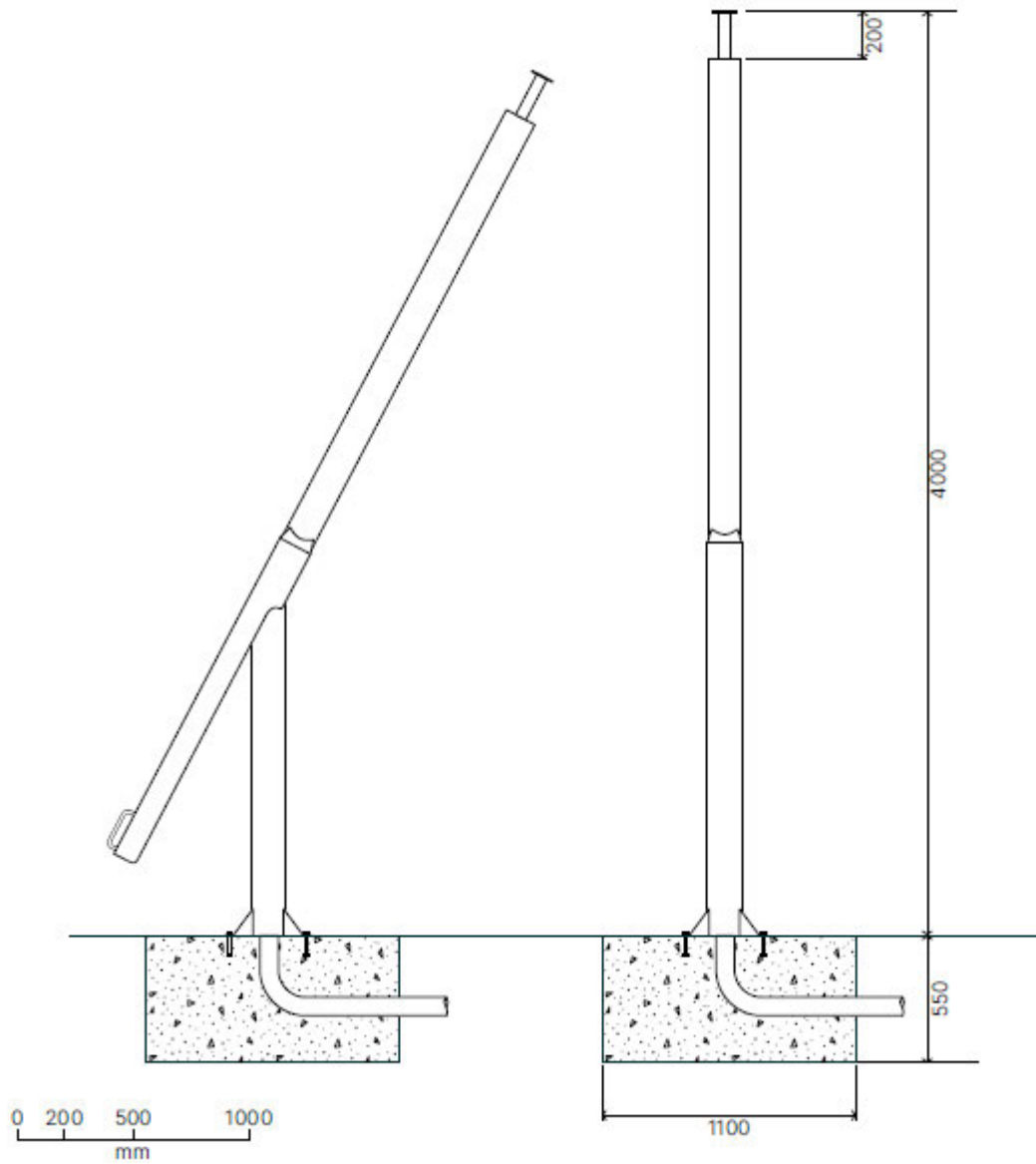


Figure 2: Altron AW1859/TD/UP wind-down CCTV column (4m tall) Moss Green.

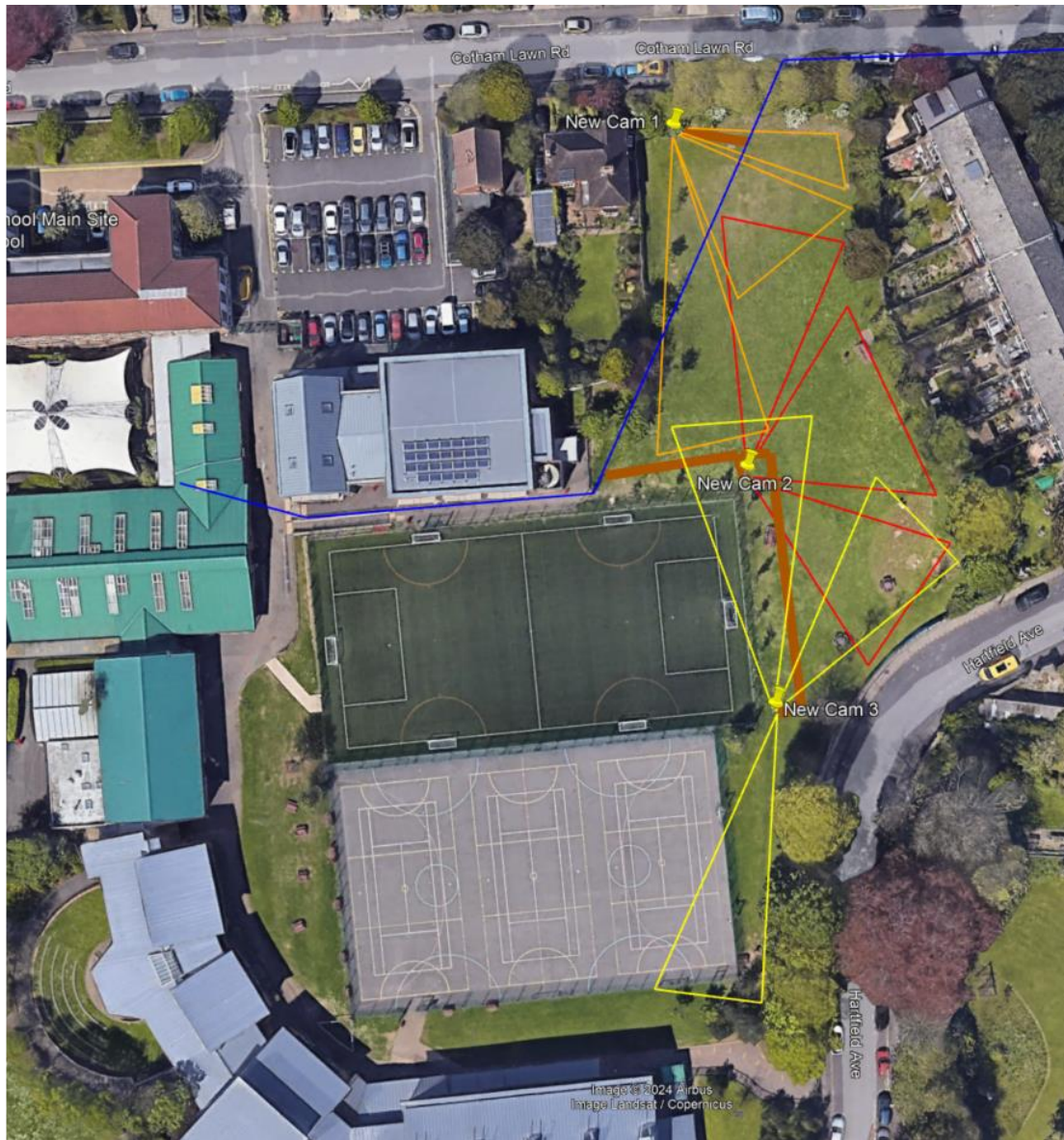


Figure 3: Proposed Camera Location Plan

- 4.4 New Cam 1, New Cam 2 & New Cam 3 locations have been selected to take into consideration proximity to trees / roots, domestic residences and bat surveys. (Existing duct route indicated in Blue, proposed new cable routes indicated in Brown).

5 NEED FOR PROPOSED DEVELOPMENT

5.1 This application for the installation of additional CCTV equipment is necessitated by the legal requirement need to ensure the safeguarding of children. There is a substantial suite of primary legislation and Statutory Instruments governing the care of children, including:-

- The Children’s Act, 2004
- The Children and Families Act, 2014
- Keeping Children Safe in Education, 2019

5.2 The purpose of the Children’s Act 2004 is to make the UK a better and safer place for children of all ages. The intent is to improve the overall wellbeing of children.

5.3 Section 1 of the Children’s Act sets out three principles:-

- The welfare of the child is paramount;
- Delay is likely to prejudice the welfare of the child;
- A Court will only intervene where it is in the best interest of a child.

5.4 S9 of the Children’s Act 2004 identifies the requirement for safeguarding targets in England which will promote the welfare of children in a local authority area. Safeguarding children is an educator’s top priority. School Governors have a legal duty to provide full safeguarding of children and to ensure the training of staff within a school to ensure that safeguarding is carried out.

5.5 The Children and Families Act, 2014 primarily sought to improve education services for children who are vulnerable and to support strong families.

5.6 Keeping Children Safe in Education, 2019 is a document containing statutory government guidance. It sets out the legal duties for all staff in education that must be followed and promotes the welfare of children and young people aged 18 years and under in schools, colleges and other education facilities across the UK.

5.7 Bristol City Council through the ‘Keeping Bristol Safe Partnership’ has produced appropriate policies and guidance for professional persons working within the education industry in Bristol to follow. The guidance is far reaching and extensive. It reflects the need to prioritise children’s needs and promote multi agency responsibility.

5.8 Cotham School operates from secure school sites at Cotham Lawn Road and at Charnwood House where all public access is controlled via the main reception points and all visitors to the School sites are expected to wear ID. This is a statutory requirement.

5.9 The selected location for the CCTV poles and cameras specifically covers an area of the School grounds adjacent to the eastern boundary where it is difficult for staff to monitor activity. In effect, it is a ‘blind corner’, where there is a risk that pupils may leave the School grounds via the boundary walls, a wider risk that unauthorised persons may enter via the boundaries, illicit substances may be passed into the School grounds, or School property may be passed out of the School grounds across the boundaries.

- 5.10 Any potential weakness or area of vulnerability around the School's perimeter undermines the ability of the School to operate a secure site and fulfil the legal safeguarding requirements. Therefore, the matter must be addressed, with there being clear evidence and legislative need for the proposed installation.
- 5.11 It is recommended that the application assessment includes consultation with Bristol City Council Education Department prior to determination. It is only in this manner that the City Council's legal requirements to safeguard children can be realised. Safeguarding is everyone's responsibility, and it should be child centred rather than diminished by other potentially competing objectives.

6 KEY PLANNING CONSIDERATIONS

Principle of Development

- 6.1 There is no national or local planning policy which restricts an applicant's right to install an ancillary camera on their property. As such, the local planning authority cannot object, in principle, to a planning application which seeks a camera installation. Whilst this means that there is no policy obligation upon any applicant applying for permission to install a camera to justify its need, the evidenced and absolute need for the proposed CCTV installation has been clearly set out in the previous section.
- 6.2 Although there is no specific Development Plan policy concerning CCTV installations, it is material that the planning policy arena supports safe, usable and accessible outdoor spaces. As such there is a clear presumption in favour of development for this proposal in accordance with the Planning & Compulsory Purchase Act, 2004, S38(6).
- 6.3 There is also clear and substantial support in national and adopted planning policy statements for the type of development proposed which, fundamentally, is a proposal to strengthen security at a school site – these statements are summarised below.

CS Introduction

- It is a 'key aim' of the adopted core strategy to '*deliver a safe and healthy city*'.

CS Policy BCS9 (Green Infrastructure)

- BCS9 seeks to 'protect' green infrastructure. This can mean protection 'from development', but also in terms of security and safety which contribute towards site usability. The policy states that: '*open spaces which are important for recreation, leisure and community use, townscape and landscape quality and visual amenity will be protected.*' It further states that new development should contribute towards the 'quality' of open space. The quality of the space is therefore intrinsically linked to delivering a safe and clean environment for the school (a community use, as per Policy DM5), and the development will support these aims.

CS Paragraph 4.9.5 (Supporting BCS9)

- States that: '*The strategic green infrastructure network is complemented by further elements of green infrastructure, such as ... school grounds ... and landscaped areas. These elements of green infrastructure have an equally important role in contributing to the sustainability and quality of life within the city and are of particular benefit to local communities.*'

CS Policy BCS21 (Quality Urban Design)

- The development will contribute towards achieving the following BCS21 policy aims by supporting the school's current use of its Cotham Lawn Road site:
 - Deliver a safe, healthy, attractive, usable, durable and well-managed built environment comprising high quality inclusive buildings and spaces.

- Safeguard the amenity of existing development and create a high-quality environment for future occupiers.
- Create buildings and spaces that are adaptable to changing social, technological, economic and environmental conditions.

CS Paragraph 4.21.11 (Supporting BCS21)

- States that: *'the built environment should be designed to deliver safe, secure, attractive, healthy, comfortable and convenient places in which to live, work, play and spend time. Development should take the opportunities available to improve the quality and appearance of an area and the way it functions. The built environment should be inclusive, respecting how people experience the city and addressing the needs of all in society.'*

DM Policy DM14 (The Health Impacts of Development)

- Requires development to contribute to reducing the causes of ill health, improving health and reducing health inequalities – which include safeguarding and crime reduction – within the city.

DM Paragraph 2.15.1 (Supporting Policy DM15 on Green Infrastructure Provision)

- The policy highlights the positive effect green infrastructure has on people's health through the provision of space and opportunities for sport and play. The development supports this aim by improving the security and quality of the school grounds and amenity space.

DM Policy DM27 (Layout and Form)

- The policy states that: *'development should be designed taking into account the needs and practicalities of servicing and long-term management of public or shared private spaces and facilities including communal and landscaped areas and deliver a secure, supportive, safe environment for users that helps to foster a sense of community and minimise the opportunities for crime.'*

NPPF Paragraph 96

- *Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:*

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities

NPPF Paragraph 97

- *To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should*

d) ensure that established shops, facilities and services are able to develop and modernise

NPPF Paragraph 99

- *...Local planning authorities should... give great weight to the need to create, expand or alter schools through decisions on applications.*

NPPF Paragraph 101

- *Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:*
 - a) anticipating and addressing possible malicious threats especially in locations where large numbers of people are expected to congregate [this explicitly includes 'education establishments' as set out in NPPF footnote 45]... layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security;*
 - b) recognising and supporting development required for operational defence and security purposes*

NPPG Paragraph 102

- *Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities*

NPPG 53-009 and 010 (What is the role of planning in preventing crime and malicious threats?)

- *Planning provides an important opportunity to consider the security of the built environment, those that live and work in it and the services it provides. Section 17 of the Crime and Disorder Act 1998 (as amended) requires all local, joint and combined authorities (as well as National Parks, the Broads Authority and the Greater London Authority) to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. Crime for these purposes includes terrorism.*
- *Good design means a wide range of crimes from theft to terrorism are less likely to happen by making committing those crimes more difficult. It helps create safer places, infrastructure and buildings that are less vulnerable to terrorist attack and, should an attack take place, where people are better protected from its impacts. It can also reduce the cost and impact of security measures by avoiding retrospective works and enable mitigating measures to be blended into the environment.*

Summary

6.4 In terms of the principle of development, there are no policy reasons to refuse the development. Equally, there is no policy or legal requirement for the applicant to justify the need for the development. Notwithstanding this, the applicant has demonstrated clear evidence and a legislative need for the proposed installation, with a review of adopted local and national planning

policy, development plans, and the PPG also pointing towards significant support for the type of development proposed, including for development which:

- Supports development which enhances community uses;
- Supports inclusivity;
- Supports the recreational use of existing open spaces;
- Supports development which enhances the quality and usability of the space;
- Supports development by schools (NPPF Paragraph 99 states that 'great weight' should be attributed);
- Which helps to secure and/or enhance space security and safety; and
- Fulfils the Council's obligations under Section 17 the Crime and Disorder Act 1998 (as amended) to do to do 'all they reasonably can' to prevent crime and disorder.

6.5 It is therefore abundantly clear that the type of development represents sustainable development, and that great weight should be attributed to its approval in accordance with the NPPF and Policy DM1.

Ecology

6.6 Policy DM19 requires development which could potentially have an impact upon habitat, species, or features which contribute to nature conservation in Bristol to be informed by an appropriate survey and assessment of impacts.

6.7 CSA Environmental were commissioned by the applicant to undertake a Preliminary Ecological Assessment (PEA) to establish the likely ecological impacts of the proposed development. The accompanying Ecological Briefing Note by CSA provides an overview of ecological considerations relevant to the proposals.

6.8 In summary, the Ecological Note confirms that the impacts arising from the proposals are limited to small scale ground works for the installation of CCTV pillars and associated ducting. With reference to the nature and condition of current habitats to be impacted by the proposed camera installations, and the limited scale of the works, the ecological constraints to the scheme were found to be negligible. All works will be carried out in accordance with the recommendations made by CSA.

6.9 As a result, it is concluded that the proposed CCTV installation will not have any significant ecological impacts and the proposals are in accordance with the NPPF and Policy DM19 of the Site Allocations and Development Management Policies (2014).

Neighbouring Amenity Impacts

6.10 Core Strategy Policy BCS21 outlines that all new development within Bristol will be expected to strive to achieve high standards of urban design and safeguard the amenity of existing development.

- 6.11 Policy DM29 of the Site Allocations and Development Management Policies (2014) further states that existing and proposed development should achieve appropriate levels of privacy, outlook and daylight.
- 6.12 The location of the camera equipment has been carefully considered to ensure that it only captures images relevant to the intended purposes, with every effort made to position the cameras so that their coverage is restricted to the school premises.
- 6.13 In terms of whether the installations could impact on the privacy of surrounding residents on their private land, the field of view diagrams provided at Figure 3 show the camera visibility splays and ranges in relation to the nearest private gardens.
- 6.14 In instances where a camera is angled towards a neighbouring property, in order to ensure privacy protection Privacy Screens / Zones will be set up on the relevant cameras. These Privacy Screens are set by the system manager and involve 'drawing' a box around the area where there is a concern to privacy, this box will then appear opaque on the system effectively screening the area from the system and its users. It is also worth pointing out that all operators and users of the system will have received training with regards to GDPR, as well as for the CCTV system, and will fully understand how to avoid any breaches of privacy for neighbours with regards to system use.
- 6.15 Notwithstanding, as demonstrated in Figure 2, the proposed cameras' coverage is largely restricted to the school premises, with an approximate separation distance of at least 25-30m between the cameras and the rear gardens of nearest properties, which are well screened by the boundary of fencing, trees and hedgerow.
- 6.16 Given the above, the proposed cameras are not considered to have any detrimental impact on the privacy of existing residents and care has been taken to ensure that reasonable privacy expectations are maintained.
- 6.17 Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. All retained data will be stored securely.
- 6.18 Accordingly, the proposals are compliant with the NPPF, Policy BCS21 of the Bristol Core Strategy (2011) and Policy DM29 of the Site Allocations and Development Management Policies (2014).

Design & Heritage Impact

Heritage Policy Summary

- 6.19 Adopted Policy BCS22 requires that development proposals safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance. Policy DM31 states that development that has an impact upon a heritage asset will be expected to conserve and, where appropriate, enhance the asset or its setting.
- 6.20 NPPF Paragraph 205 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. Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

- 6.21 NPPF paragraph 207 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.

Impact upon Defined Heritage Assets and Settings

- 6.22 The Site is located within the Cotham and Redland Conservation Area. The main Cotham School building located to the northwest is classified by Bristol City Council as a Locally Listed Building, and thus can be considered to be commensurate with a non-designated heritage asset in the terms of the NPPF.
- 6.23 There are no listed buildings located within the site, nor immediately adjacent to it. There are however a number of Listed Buildings located within the vicinity of the Site, including the Grade II Listed Muller House to the East across Hartfield Avenue, as well as numerous other listed properties along Cotham Road.
- 6.24 It is considered without doubt that the application site, within the playing fields on the eastern edge of the school premises, does not form part of the setting of the Listed Buildings within the surrounds and does not contribute towards their heritage significance. A review of historic mapping and analysis of the historic development of the Site has not identified any functional or associative connections between the Site and surrounding listed heritage assets.
- 6.25 During the site visit it was also established that intervisibility between the site and the designated heritage assets listed above is extremely limited, with no visual relationship of any importance. To further reduce visibility, the proposed CCTV Columns will be finished in a Moss Green (RAL No. 6006) to blend into the natural surroundings. As a result, the development is found to be appropriate in design and would not disturb the setting of the identified heritage assets in a negative way.
- 6.26 The Character Appraisal for the Cotham & Redland Conservation Area highlights the extent of green space provided by the playing fields within the Cotham School complex as a strength of the area's overall character and aesthetic. Given the precedent for ancillary development within the School premises, the proposed camera installations would not be out of character and are designed to be unobtrusive, occupying only a minimal portion of the School's playing fields, thereby preserving the existing character and visual integrity of the green space and wider Conservation Area.
- 6.27 Accordingly, the proposed development is considered to have a neutral impact, causing no harm to the overall character, appearance or setting of the nearby listed properties, the Cotham and Redland Conservation Area, or the non-designated main Cotham School building. Given the above, the development is found to accord with heritage planning policy and overarching legislation.

The Public Benefits

6.28 It is acknowledged that assessment of heritage impact is a subjective matter. If the LPA reaches a different conclusion to the applicant, i.e. that harm would be caused, then the public benefits of the proposal must be successfully weighed against the assessed level of heritage harm in order for the development to be found acceptable (NPPF 207).

6.29 In this case, it is considered that any level of harm can only reasonably be assessed to be 'less than substantial', and likely at the very lowest level of the 'less than substantial' spectrum, given the design and scale of development and the context of assets as described. To ensure a robust submission in light of all eventualities, the public benefits of the proposal to counteract this low level of harm are described below:

- Help to deliver a secure, supportive, safe environment for users within the premises of Cotham School;
- Help to strengthen and identified area of vulnerability around the school's perimeter which undermines the ability of the school to operate a secure site and fulfil their legal safeguarding requirements;
- Supports development which enhances community uses;
- Supports the recreational use of existing open spaces;
- Supports development which enhances the quality and usability of the space;
- Supports development by schools (NPPF Paragraph 99 states that 'great weight' should be attributed);
- Fulfils the Council's obligations under Section 17 the Crime and Disorder Act 1998 (as amended) to do to do 'all they reasonably can' to prevent crime and disorder;
- Required under the Children & Families Act;

6.30 Given the above, it is clear that there will be a great many public benefits delivered by the scheme across a wide range of policy and legislative supported metrics. This includes a benefit which is to be given 'great weight' in decision making. As such, it is considered beyond doubt that the public benefits to be delivered by the development will far outweigh any possible low level of harm which the LPA may evidence. Therefore, and in accordance with policy, the proposed development should be considered acceptable in heritage terms.

7 CONCLUSION & PLANNING BALANCE

- 7.1 This application seeks consent to install 3no. fixed-position closed-circuit security cameras on top of 4m columns (“the cameras”) within the grounds of Cotham School, Cotham Lawn Road, Bristol, BS6 6DT.
- 7.2 Section 3 of this report identifies relevant Development Plan policy and National Planning Guidance. Although there is no specific planning policy in Bristol concerning CCTV installation, there is repeated references within policy to ensure safe, attractive, accessible and usable spaces for all.
- 7.3 Such matters are important material considerations in the determination of this planning application.
- 7.4 A legislative need for safeguarding of children arising through S9 of Children’s Act 2004, is also a most important material consideration. Safeguarding children is an educator’s top priority, with School Governors having a legal duty to provide full safeguarding of children and to ensure the training of staff within a school to ensure that safeguarding is carried out. Any potential weakness or area of vulnerability around the school’s perimeter undermines the ability of the school to operate a secure site and fulfil their legal safeguarding requirements.
- 7.5 All of the above factors weigh heavily in the balance to favour of the grant of planning permission.
- 7.6 The Ecological Note by CSA concludes that the proposed CCTV installation will not have any significant ecological impacts and the proposals are in accordance with Policy DM19 of the Site Allocations and Development Management Policies (2014).
- 7.7 The amenity of existing residents has been taken into account to ensure that reasonable privacy expectations are maintained. Accordingly, the proposals are compliant with Policy BCS21 and Policy DM29 of Local Development Plan.
- 7.8 The heritage assessment undertaken above concludes that a neutral impact will occur as a result of the CCTV installations, with the proposed development causing no harm to the overall character, appearance or setting of the nearby listed properties, the Cotham and Redland Conservation Area, or the non-designated main Cotham School building. Should the LPA consider the heritage impact to amount to ‘less than substantial harm’, then it is considered beyond doubt that the public benefits to be delivered by the development will far outweigh any possible low level of harm which the LPA may evidence. This includes a benefit which is to be given ‘great weight’ in decision making.
- 7.9 The planning balance therefore concludes that there is an overwhelming case in favour of approval of the installation.

