



## INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Sir

### **Satellite Dishes and Other Antenna – Consultations on Possible Changes to Planning Regulations**

I refer to your invitation for comments on the above document.

The Institute of Historic Building Conservation is the professional institute, representing conservation specialists and practitioners in the public and private sectors in the United Kingdom and the Republic of Ireland. It has around fourteen hundred members divided between fourteen branches. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

The consultation paper seeks to strike a balance between the needs of rapid technological development of communications and the impact on the environment of distributed means of receiving communication by end users in residences and commercial premises.

As far as the IHBC is concerned the questions revolve around the number and size of dishes and antennas, their visibility and impact on historic surroundings. The most sensitive locations are likely to be in residential areas but commercial areas are also involved.

The greatest visual impact in historic areas for normal households will be the potential use of separate satellite dishes for broadband and digital satellite. Wireless antenna depending on size and shape will also have some impact on historic environments. Satellite dishes will be constrained in their location by the direction and elevation of the satellites. It was noticeable that there were more difficulties in securing suitable locations for digital rather than analogue satellite dishes. Although the size of the dish was smaller, the lower elevation of the satellite forced dishes to be put into more prominent locations particularly in dense urban locations.

Whilst the design and size of future antenna and dishes are not known at present it would have been helpful for an indication of the type of mesh radio wireless antenna currently in use to be shown by means of photograph so that the impact could be visualised. Impact on sensitive environs depends not only on size but also on shape, colour and material. Without an understanding of this it is difficult

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to comment fully on the reasoning behind the boundary between permitted antenna and those requiring specific permission. Option 1 the current situation, for instance refers to 1591 sq cm as the limiting measurement for 2 dimensional profile under Part 24 of the GPDO (para4.52). Was this based on particular technology of 1991 now rendered redundant? Presumably, the dimensions now proposed are based on the likely largest antenna which can be expected now or in the future.

The visual impact assumptions in the document seem to be based on:

- Front walls as being the most prominent locations
- Chimneys and roofs as being the second most prominent locations

However, each option progressively allows the height above roof or chimney to be extended above the roof or chimney by increasing amounts. Dishes or antenna not more than the height of the highest part of the roof can be intrusive in the street scene through the skyline effect of appearing to be above the apparent height of the roof to an observer at ground level. As a design principle the dish or antenna should be placed at the lowest point of the roof consistent with obtaining a line of sight to the orbiting satellite.

In some instances, a small pole would allow dishes to be attached to the back walls of properties to minimise visibility from the street. Where buildings have gardens or large grounds it may be more appropriate to require that dishes or other receiving equipment are located on tripods or poles and not physically attached to the building.

The revised concept of permitted development requiring the dish or antenna to not only front but also to be visible from the highway or waterway in the Broads brings considerable subjectivity to the situation. Trees can modify views in the street scene. For instance, is the viewing of the dish to be from directly in front of the building or from angled views from adjoining properties. What happens if trees are subsequently cut down either in front of the property or on plots adjoining? In some designated areas there may be control of subsequent removal of trees and outside those areas only if Tree Preservation Orders are in place. It may be better to use a distance criterion that if buildings are more than 30 metres from the highway then permission is not needed.

Facility sharing should be the norm in blocks of flats, subject to technical constraints. The impact of dishes on tall buildings and flats can be significant and the growth in the communications market in the future could lead to a plethora of dishes and antennas unless an integrated reception system is installed at the outset. The first dishes and antenna can be erected with the benefit of permitted development rights, further ones may not have a significant effect, but eventually the progressively adverse effects on amenity may be hard to resist. The costs of an integrated reception system are spread between a diminishing number of occupiers at a disadvantage compared to earlier applicants.

Communal poles or platforms should be considered where permission could be granted for them, on parts of flats where they cannot readily be seen (eg a horizontal pole hidden behind a parapet on the roof of a block of flats). Leaseholders could then attach their dishes to them without the need for planning permission.

Where public buildings or churches are concerned, dishes should always be located where they would not be visible from the street. Visible antennae would hardly ever be acceptable on such properties.

The degree of control should be related to the possibility of realistic enforcement. Even in the most sensitive environments such as Port Sunlight Village the rapid growth of satellite dishes has had an adverse impact but the resources of the local authority are limited to the extent that action has only been taken on the worst cases.

I trust that these comments are helpful.

Yours faithfully

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Consultations Secretary