**21/02310/TEL**

**Street Record, Locksbrook Trading Estate, Lower Weston, Bath, Bath And North East Somerset,**

Proposed 5G telecoms installation of 20m high 'slim line' Phase 8 H3G street pole c/w wrap around cabinet and 3no. cabinets with ancillary works, to be coloured grey.

*Comment*

The proposed site of development is located along Locksbrook Road, situated within the Bath conservation area and World Heritage Site. It is located east of the Grade II 1970s Herman Miller Factory, now the new Locksbrook Campus for Bath Spa University. The area is primarily light industrial in character and forms part of the Bath Enterprise Zone along the riverside, with low rise residential terraces to the north and west. The area, whilst industrial, does remain at a consistent 2-3 storey height throughout, although development of an increased height has been recently permitted (see the Plumb Center, application 20/00023/FUL).

We note this application forms an increasing number of applications in and around Bath for new telecommunications and 5G masts. These include:

* 19/05534/FUL, Woolley Lane, Charlcombe – Refused.
* 20/01315/TEL, Woolley Lane, Charlcombe – Withdrawn.
* 20/02388/TEL, Claverton Buildings – Refused.
* 20/03255/FUL, Larkhall Sports Club, Charlcombe – Permitted.

BPT continues to emphasise that we appreciate the necessity for the upgrade of the existing provision of access to 5G networks throughout Bath; it is an important and positive improvement of public amenity and technological access. We note the increasing pressure for 5G installation and the upgrade of existing telecommunications services that are reaching the end of their lifespan, although we have concerns regarding the current piecemeal approach of installation proposals by multiple different service providers.

Considering the predominantly light industrial character of the area, we feel that the installation of a 5G monopole would be of a lesser adverse visual impact than in other more sensitive or historic character areas. We maintain the selection of an industrial site would be more appropriate than a primarily residential area.

We feel that the current, more slender monopole design is preferable to a bulkier, more top heavy design as has previously been proposed elsewhere (see application 19/05534/FUL).

BPT reiterates the need for a cohesive city-wide operations plan for the future installation of telecommunications equipment. We maintain concerns that the permit of singular applications would establish a precedent for piecemeal development without consideration of the wider cumulative impact on the character and appearance of the conservation area and the special interest of the World Heritage Site. Due to the shorter range of 5G wavelengths, an unspecified increase in volume of telecommunications installation would be required to provide connectivity both in and around Bath, as well as increasing pressure to deliver within sensitive historic environments and landscapes. We therefore maintain concerns regarding this application as a potential precedent for the intensified roll-out of 5G masts within the sensitive landscape setting of the Bath conservation area and World Heritage Site, without the formulation of a demonstrated scheme or operations plan regarding ongoing upgrades, either within a single supplier or across multiple suppliers.

BPT consequently urges this increasing trend in telecommunications applications to be accompanied by a cross-operator masterplan that highlights appropriate sites, mast designs, and volume caps across Bath and north-east Somerset to ensure a cohesive and sustainable approach to district-wide upgrades. We maintain that operators should be encouraged to share masts wherever possible to reduce the total amount of infrastructure required. We encourage the consideration of a palette of potential monopole designs to ensure citywide consistency whilst favouring a slimmer profile which would be less visually bulky or top heavy, and therefore of reduced visual harm.

There appears to be no reference to telecommunications equipment within the current Bath Pattern Book which is of concern, and allows for an increasing variety of incongruous and intrusive designs without guidance on what may be appropriate within the historic city core of the conservation area and World Heritage Site, and its interconnected urban setting.

We highlight similar collaborations in the creation of a Joint Accord between service providers and the Cotswold Conservation Board in 2011.

BPT additionally highlights issues with the addition of further street clutter and associated visual detriment to the public realm. We maintain that the installation of new infrastructure should incorporate the removal of defunct equipment, such as cabinets or telegraph poles, by the operator to minimise street clutter, remove unwelcome targets of flyposting and graffiti, and offset potential visual harm by new installations.