

**Revised Written Comment to Planning Committee 08/02/2021**

**20/03255/FUL**

Larkhall Sports Club, Charlcombe Lane, Charlcombe, Bath, Bath And North East Somerset, BA1 8DL

Erection of a 20m high monopole supporting 3no. antennas and 2no. 0.3mm dishes above the top of the pole, the installation of 1no. equipment cabinet on new base and the installation of ancillary equipment.

***Revised Written Comment***

The proposed site of development is located along Woolley Lane to the east of Charlcombe village, adjacent to the Larkhall Athletic Football Club. The proposed monopole would be located in the north-east corner of the sports field, to the south of the Grade II 17th century Twinfield Farmhouse. Both Charlcombe Lane and Woolley Lane are characterised by narrow, rural lanes and are well-screened with mature trees, but with exposed views to the east across the Lam Brook Valley and Larkhall. Whilst not within the Charlcombe conservation area, the site is positioned within Bath’s Green Belt and the Cotswolds AONB, and remains an attractive and significant rural area within the setting of Bath’s World Heritage site, which is recognised to be of Outstanding Universal Value.

This application marks the second application for a telecommunications monopole on this site (see application 19/05534/FUL), to which we objected on grounds of unmitigated visual harm to the Green Belt and AONB, a lack of considered design, and little demonstrated understanding as to the monopole’s rural, verdant setting. This has been refused at Planning Committee on grounds of inappropriate development within the Green Belt and adverse visual impact on the AONB.

BPT continues to emphasise that we appreciate the necessity for the upgrade of the existing provision of access to 5G networks in rural areas that are often not as well serviced as our urban centres; it is an important and positive improvement of public amenity and technological access.

There continues to be a misnomer within this planning application; whilst the monopole itself would be 20m, the total height of the structure including the proposed antennas would be 23.4m. It is this latter height that should be consequently referred to throughout the application when considering visual impact.

5G masts operate at a higher frequency to deliver connectivity at a higher speed and higher capacity. However, this results in a shorter-range signal that is easily obstructed by objects such as walls and trees. Consequently, 5G masts are required to be of an increased height to ensure transmission clearance over the tops of vegetation coverage and an increased density of transmitter mast installation as part of ongoing upgrades to the existing network, with resulting visual detriment to landscapes of special aesthetic and environmental interest. 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. Other similar developments have been previously proposed on this site in a contrasting design (see application 19/05534/FUL).

As part of the Government’s *Code of Best Practice on Mobile Network Development in England* (2016), important considerations as to the suitability of telecommunications development include the assessment of the appearance and character of the area, consideration of skyline views, and the analysis of near and far views and how these would be publicly experienced. The Cotswolds Conservation Board highlights the need for great care with the siting and scale of masts where the landscape is considered to be particularly sensitive in their *Position Statement on Telecommunications and the Rural Economy* (2013). This application does not appropriately consider nor justify the proposal within its elevated landscape context within the indicative setting of both the Charlcombe and Bath conservation area, and the sensitive green hillside setting OUV of the World Heritage Site.

We maintain that it is critical at this moment to establish a fixed framework for appropriate mast designs and positions in the landscape to ensure the protection of the special qualities of the Cotswolds AONB. We note the present and future demand for improved 5G connectivity across Bath and its environs, but a more considered approach across all providers is needed to ensure a homogenised design and landscape strategy. In its 2013 position statement, the Cotswolds Conservation Board encouraged opportunities for site and equipment sharing, including across local authority boundaries, and paragraph 113 of the NPPF notes that development should be kept to a minimum (consistent with demand and capacity). We therefore highlight the potential for mast-sharing in order to concentrate visual harm to one reduced area of a lower sensitivity, rather than a spread of masts resulting in cumulative visual impact across the wider landscape. The site of this theoretical mast would need to be extensively considered and assessed before being deemed appropriate for development with regards to impact on landscape setting, the special qualities of the AONB, the openness of the Green Belt, and detriment to residential amenity.

Therefore, this application in its current form has not been adequately considered with regards to its visual impact on its sensitive landscape setting in the weighing of harm against public benefit. We emphasise that this application could propose an intensification of mast usage in this hillside area of the AONB, in conjunction with the existing mast at the junction of Charlcombe Lane and Woolley Lane. In light of the recent refusal of application 19/05534/FUL for the upgrade of an existing mast on grounds of inappropriate development within the Green Belt, we see no reason why this proposal for a new mast would be considered appropriate development.

We continue to call for a cohesive and holistic approach to telecommunications development within the AONB, Green Belt, and the setting of the Bath and Charlcombe conservation areas and the Bath World Heritage Site.