



Bath Heritage Watchdog

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APPLICATION NUMBER: 17/01138/REG03

ADDRESS: Street Record, Southgate Street

PROPOSAL: Installation of broadband network access points at various locations across the city

CASE OFFICER: Anna Jotcham

DATE: 28 May 2017

COMMENT: OBJECTION

This is a poorly presented and sloppy application which seems to have been partially amended following a pre-app. This has resulted in confusing documentation: on one hand it appears to be applying for permission for several positions; and on the other hand it provides alternatives. This leaves considerable doubt about what would actually be installed.

The aerial views which are relied upon for locations are out of focus and are annotated in a different way to the text, and information is shown in red which is virtually illegible. For such a large project, with the potential for considerable harm, we believe that the documentation should be far more legible and accurate. We requested revised documentation via the case officer in order to be able to accurately assess proposals but have received no response. We would suggest that the application is withdrawn and resubmitted in a much clearer and more specific form.

What is clear, however, is that a huge number of installations are proposed. Conservations Areas are '*areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance*' (Planning (Listed Buildings & Conservation Areas) Act 1990) yet this application proposes the installation of 55 pieces of equipment, many on 'alien' extension poles to existing street furniture. The cumulative impact of this application (and no doubt others in due course) will lead to a considerable increase in undesirable harm to the historic environment.

The applicant's assertion that *'The proposals do not cause substantial harm to the conservation area or to listed buildings, nor result in the loss of heritage assets. They will contribute to the conservation of heritage assets through the enhanced use of public realm'* simply beggars belief and clearly shows a lack of understanding of the historic environment.

AP1 (traffic light)	It is impossible to see from the documentation which of the traffic lights at this junction is proposed. As most of Charles Street is listed we are concerned at the impact on the listed assets of an extension pole.
AP2, 3 & 4	Difficult to fully assess without drawing or montage, but would appear neutral
AP5 (traffic light)	It is impossible to see which traffic light is proposed from the documentation. The junction is surrounded by listed buildings and therefore the proposal for an extension to the traffic light is unacceptable
AP6	Difficult to fully assess without drawing or montage, but would appear neutral
AP7 (and alternatives)	Unacceptable due to extension and the location in one of the most important setpieces in the city.
AP8, 9 & 10	Difficult to fully assess without drawing or montage, but would appear neutral
AP11	Impossible to work out the location as Sawclose covers a large area and the documentation is not clear
AP12	It is impossible to see which traffic light is proposed from the documentation. As this is part of one of the most important setpieces in the city the proposal including an extension pole is totally unacceptable
AP13	Difficult to fully assess without drawing or montage, but would appear neutral
AP14	Can't assess as location unclear. Burton Street does not have a junction with Green Street
AP15	The use of an extension is unacceptable at the end of one of the most important streets in Bath – Milsom Street
AP16	The use of an extension is unacceptable
AP17	Difficult to fully assess without drawing or montage, but would appear neutral
AP18	This is within one of the most important setpieces in Bath, and would impact on a Grade II* terrace. Totally unacceptable
AP19	There is already enough clutter fixed to what appears to be an historic lamppost, therefore not considered acceptable unless other clutter is removed.
AP20	There is enough clutter fixed to this lamp already. Not acceptable
AP21	Would adversely impact on one of the setpiece views in the city towards the Circus. Unacceptable
AP21b	Totally unacceptable due to harm to lamppost and the Circus
AP22	Difficult to assess without drawing or montage, but would appear neutral
AP23	Concerns at impact on the Grade II* listed Mineral Water Hospital. Would need accurate drawing/montage to assess impact
AP24	The use of an extension is unacceptable
AP24a	Unacceptable due to impact on Grade II* listed Mineral Water Hospital
AP25	Impossible to see which traffic light is proposed. Use of an extension would be unacceptable due to harm to the former post office
AP26	Difficult to assess without drawing or montage, but would appear neutral
AP27b, AP28	Difficult to assess without drawing or montage, but would appear neutral
AP29	Difficult to assess without drawing or montage, but concerns over impact on the Abbey
AP31	Impossible to locate due to lack of information on position. Assumptions being made about power which should have been checked prior to submitting the application
AP32	Difficult to assess without drawing or montage, but may impact on Guildhall

AP33	Cannot assess as no details provided for the location and fixings. This is a listed building and therefore a listed building application is required. Unlikely to be acceptable
AP34	Difficult to assess without drawing or montage, but would appear neutral
AP35	If this already has consent why is it listed?
AP36	Considered unacceptable due to harm to the Roman Baths complex. Document states extension to traffic light but there are no traffic lights in this location. Considerable doubt as to where the location is.
AP37, AP38, AP39	Difficult to assess without drawing or montage, but would appear neutral
AP40	Unacceptable due to the impact on the view towards the Grade II* listed railway station.
AP41	Difficult to locate as there are many traffic lights outside the railway station. However all would have an adverse impact on the Grade II* listed railway station
AP42	Difficult to assess without drawing or montage, but would appear neutral
AP43	Impossible to assess as location unknown. There are lots of traffic lights outside the bus station. Unlikely to be acceptable due to extension
AP44	Impossible to assess as location unknown. There are several traffic lights which could fit the description. Unlikely to be acceptable due to impact on the Grade II * listed Forum.
AP45, 45a	Not desirable but again assumptions being made about power which should have been checked before application submitted
AP46, 47	Difficult to assess without drawing or montage, but would appear neutral
AP48	Cannot find a lighting column on the junction though there is one in Hot Bath Street. This is historic in style (if not historic) and therefore concerns. Cannot assess unless location is clarified
AP49	Which traffic light is intended? The east side would impact on St John's Church
AP50	Difficult to assess without drawing or montage, but would appear neutral
AP51	Difficult to assess without drawing or montage, but concerns over impact of extension
AP52, 53	Difficult to assess without drawing or montage, but would appear neutral
AP54	Change would require another listed building consent due to change in equipment. Cannot assess without such information
AP55	There isn't a junction of Orange Grove and Pierrepont Street, therefore location unknown. If the junction of Orange Grove and Terrace Walk is intended then unacceptable due to extension and impact on the Empire Hotel
AP55a&b	Only a basic map provided, no details on the actual location or equipment, therefore impossible to assess.

Given the substantial harm to the historic environment (and the considerable doubt about the precise locations of much of the equipment) described in the above table, we do not believe that any public benefit is sufficient to outweigh the adverse impact. Nor do we believe it is actually as beneficial as it claims to be: free wifi is already available inside and outside most pubs, cafes and restaurants and several other retail premises, many local buses, and from BT and Virgin Media installed wifi hubs (for those of their customers away from home). Most tourists already have internet access via mobile phone technology on their smartphones too.

It also has to be taken into account that such apparatus will appear in photos taken by our visitors, and will be shown around the world. Such photos will serve to show that we do not value our historic environment.

The application is also contrary to the Public Realm & Movement Strategy as laid out in the Bath Pattern Book where the idea is to reduce clutter and visual intrusions into the streetscape. It clearly states all opportunities to reduce street furniture should be implemented and anything new should conform to that in the pattern book.

This application has all the hallmarks of being driven by ego and enthusiasm rather than an actual need, and the ready availability of alternatives proves that there is so little new public benefit to offset the harm that would be caused that this application should be refused or withdrawn rather than revamped.