



EQUINIX

DESIGN, ACCESS & SUPPORTING STATEMENT

Cell Reference	BT Telecom Tower		
Site Address	BT Telecom Tower, 45 Maple Street, W1T 4BG		
Easting	29215	Northing	81889
Description of Development	The installation of 3 no. 1.8m diameter dish aerals & 2 no. 0.6m diameter dish aerals located at roof level and development ancillary thereto.		

CONTENTS

1.0 General Introduction & Site Details

- 1.1 Description of Application Site and Surroundings
- 1.2 Description of Development
- 1.3 Access Arrangements

2.0 Technical Justification

3.0 Pre-application Consultation

4.0 Reasons for Selecting the Site and Design

5.0 Planning Policy

- 5.1 National Policy
- 5.2 Local Policy

6.0 Health & Safety

7.0 Summary

Appendices

Appendix A - Technical Justification

Appendix C - ICNIRP Compliance Statement



EQUINIX

1.0 General Introduction & Site Details

This supporting statement forms part of an application for planning permission and listed building consent on behalf of Equinix. The application relates to the installation of 3 no. 1.8m diameter dish aerials & 2 no. 0.6m diameter dish aerials located at roof level and development ancillary thereto. Located at BT Telecom Tower, 45 Maple Street, W1T 4BG.

This supporting statement aims to assist the Local Planning Authority in their evaluation of the telecommunications proposals, stating clearly the facts and issues surrounding this planning application. It takes into account the matters of address relating to a "Design and Access Statement" which is a requirement of s.42 of the Planning and Compulsory Purchase Act 2004. This supporting statement helps to set out the processes that have taken place towards establishing the siting and appearance of the development which now forms part of this planning application.

1.1 Description of Application Site and Surroundings

The BT tower, located at 45 Maple Street, Fitzrovia, London once fulfilled a major requirement for technology needs. It was originally designed to host aerials that were used to transmit microwave signals for television broadcasting and trunk telephone calls.

The BT tower is located in the London Borough of Camden and is one of London's most prominent landmarks. The tower is in a central and accessible location within central London, in close proximity to Tottenham Court Road, a principal arterial routeway.

The BT tower itself is not within a Conservation area but close to both the Charlotte Street and Bloomsbury Conservation Areas.

There are already numerous existing telecommunications operators present on the BT tower.

1.2 Description of Development

The proposed development at this location relates to the installation of 3 no. 1.8m diameter dish aerials & 2 no. 0.6m diameter dish aerials located at roof level and development ancillary thereto.

It is noted that the above are detailed in the 1APP forms and the plans (Drawing Ref.: - WL 4004195/ 01, 02, 03 and 04) that accompany this full planning and listed building consent application. Nevertheless should the Local Planning Authority be minded to grant planning permission and feel alternative measures of mitigation would help improve the proposed scheme then the applicant would welcome any suggestions during the life of the application so as to prevent any unnecessary condition(s) being attached to a decision. Similarly, should more details and or samples be required, any such request can be forwarded via the agent to the applicant.

1.3 Access Arrangements

Given the proposals siting externally on the roof of the tower, the site will only be accessed by those personnel associated with the applicant. In light of the siting of dishes on the roof of the BT tower and the intended use to provide telecommunications coverage, the public should have no interest or need to access the site. It should therefore be recognised that access to the proposals is set well away from recognised public rights of way and is remote from pedestrian and vehicular movements within the public realm.



EQUINIX

The applicant will make use of existing internal routes such as the internal lift during construction. It is likely that once built, the site will be visited infrequently for maintenance purposes only. Right of entry to the site will be primarily by foot in which the applicant will make use of internal access arrangements so as to gain access to the equipment housed on the tower. In the event that any of the dishes that form part of the scheme needing to be maintained this will be achieved by internal rooftop access.

2.0 Technical Justification

A technical justification is also enclosed in appendix A that indicates the neighbouring sites which this proposal will link into, giving a more conclusive picture of the extent of the project.

3.0 Pre-application Consultation

The Government strongly encourages pre-application discussions between applicants and local planning authorities in order to find the optimum solution for the development requirements. Paragraphs 9 – 13 of PPG8 go on to advise that pre-application discussions should also be carried out between operators and other organisations with an interest in the proposed development as well as people likely to be affected by the proposals including schools.

In order to explore the possibilities with regard to this proposal a pre-application consultation exercise has been undertaken. This proposal was given a Green rating when it was assessed against the Traffic Light Rating Model, further details of the Traffic Light Rating Model can be found in Annex D to the Code of Best Practice on Mobile Phone Network Development.

Initial pre-application consultation exercise was undertaken with the case officer, Mr David Peres da Costa on the 10th October 2011 regarding the proposal to locate telecommunications equipment on the BT Tower. Thereafter a further more specific email dated 22nd November 2011 regarding the design of the site at the BT Tower was sent to the LPA. As a direct result of the above correspondences the case officer contacted Equinix's planning agents in order to confirm their receipt and state their general support for the proposals as detailed in the plans forwarded via email. On the 1st December 2011 an email was received from the case officer Mr David Peres da Costa stating *"Given their size and location the proposed dishes may be considered acceptable. I have confirmed this view with a conservation officer. However, I would advise you to include a justification for the location of the dishes with your application. Let me know if you would like a formal letter detailing this advice and if you require any further information."*

The aforementioned formal letter was received via email on 6th December 2011. The letter confirmed that which was stated in the email of 1st December 2011 and listed numerous items for a valid application. This advice has been followed and the application submitted contains all of the information as detailed in the letter dated 6th December 2011 received via email.

4.0 Reasons for Selecting the Site and Design

Given the makeup of the area and lack of alternative sites due to the required height of the proposal, it soon became clear that the BT tower was the main site of telecommunications provision in this area and within the line of site (LOS) technical requirements of Equinix. Indeed, the BT Tower hosts existing operators and was originally constructed for telecommunications purposes.

In light of the above, and the location of the connecting sites at Telefónica 260 Bath Road, SL1 4DX and a proposed Arqiva tower called 404 Basildon, it is argued that by locating on the roof of the existing BT Tower the appearance of this listed building would not be adversely affected. The proposal is considered to have a minimal impact upon the appearance of the BT Tower due to the location, size and scale of the proposed dishes.



EQUINIX

In relation to how the proposal fits into the surrounding area, when compared to the other telecommunications already present, this proposal will have a minimal impact upon the host building and its surroundings. The dominant nature of the existing BT Tower in comparison to the small nature of the proposed scheme will enable the operator to provide the required level of coverage with the lowest possible impact upon the appearance of a listed building and its surrounding area.

In light of Equinix's efforts to design the best solution for this particular site so as to minimise the impact of development on the host building and immediate surroundings, it is considered that the appearance of the proposed solution would not seriously impact upon the visual amenity of the area or listed building, nor would it form an obtrusive feature on the listed building.

In light of all the above the application site was selected because it is the considered to be the optimal environmental and network solution. The proposed design represents the best compromise between the visual impact of the proposal on the host building and meeting the technical coverage requirement. It is considered that the proposals will preserve the character and setting of the listed building and in locating on a tall building with existing telecommunications.

5.0 Planning Policy

5.1 National Policy

National guidance contained within planning policy guidance notes and Governmental circulars have been determined to be material considerations in determining planning appeals. In this instance, it is our opinion that the following advice is material:

PPG 8 – Telecommunications (2001)

PPG8 'Telecommunications is the national planning document offering guidance to local authorities in the formulation of local plan policy and evaluation of telecommunications developments.

Overall aim of PPG8 is to allow for the growth of new and existing telecommunications networks in conjunction with environmental considerations. Paragraph 1 of PPG8 emphasises the Governments' generally positive approach to telecommunications: - *"The Government's policy is to facilitate the growth of new and existing telecommunications systems whilst keeping the environmental impact to a minimum. The Government also has a responsibility for protecting public health."* Paragraph 1, PPG8

PPG 8 goes further and states that *"The aim of telecommunications policy is to ensure that people have a choice as to who provides their telecommunication service, a wider range of services from which to choose and equitable access to the latest technologies"*. Paragraph 2, PPG8

Paragraph 7, advises that each telecommunications system have different antenna types, siting needs and other characteristics. *"Planning Authorities should have regard to any technical constraints on the location and proposed development."*

PPG8 acknowledges the commercial pressures placed of mobile telecommunications systems and that basis of demand for such services, confirming that: - *"These systems are demand-led. Increase in the use of mobile phones has meant that operators are continually expanding their networks to accommodate customer requirements of service and quality. The greatest need for base station sites is usually in built-up areas where there is the greatest density of mobile users, and within a mile or two of the main roads, where the demands on network capacity are greatest."* Paragraph 22, PPG8



EQUINIX

With reference design PPG8 confirms that operators should be innovative in their design solutions and should attempt to find solutions that minimise potential amenity and intrusion issues, stating that: - *"The telecommunications industry is encouraged to continue to develop innovative design solutions, in terms not only of the structure of masts and antennas but also the materials and colouring. A number of different design solutions are currently available. These include masts designed to look like trees or street furniture, and the redevelopment or restoration of existing properties to incorporate telecommunications apparatus. Authorities may wish to discuss with operators different design and camouflage options in connection with development proposals. Operators are encouraged to provide examples of different design solutions. It should be borne in mind that some designs may not be suitable for future sharing. Where it is agreed that a site is suitable for future mast sharing, it may be appropriate to install a mast specifically designed to facilitate its redevelopment for sharing."* Paragraph 77, PPG8

PPG15 – Planning and the Historic Environment (1994)

PPG15 provides a full statement of Government policies for the identification and protection of historic buildings, conservation areas, and other elements of the historic environment. It explains the role played by the planning system in their protection. It complements the guidance on archaeology and planning given in PPG16. In addition to normal development controls, the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest. In many instances there is a close link between controls over listed buildings and conservation areas. In such cases development and conservation issues will generally need to be considered together.

With regards Listed Buildings PPG15 acknowledges the importance of buildings that are of historic interest, in which particular physical features be its design, plan, materials or location are of importance to draw attention to.

It is recognised paragraph 3.13 that *"many buildings can sustain some degree of sensitive alterations or extension to accommodate continuing or new uses."* Indeed it is acknowledged in paragraph 3.13 that some additions to Listed Buildings within a secure and long-term ownership should not be discounted, providing they are done sensitively.

5.2 Local Policy

Section 54A of the Town and Country Planning Act 1990 (as amended) states that "in making any determination under the planning Acts, regard is to be had to the development plan, the determination is to be made in accordance with the plan unless material considerations indicate otherwise."

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that *"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise"* The development plan framework is provided by the Camden Council Development Plan. The plan was adopted by the Council in 2007. It is considered that the following policies are applicable: -

B5 – Telecommunications

"The Council will only grant planning permission for telecommunication development where consideration has been given to minimising harm to visual amenity and the environment. The Council will consider:

a) the appearance of the development including materials, colour, design, dimensions, overall shape, and type of construction, as well as alternative designs which may be more suitable for the building or environment;

b) the siting of the development, including the height of the building or site, its relationship to existing topographical features and natural vegetation, its effect on the skyline and views; and its relationship to conservation areas, listed buildings and residential properties;



EQUINIX

- c) the relationship of the development to existing telecommunications equipment, any technical constraints on the location and design and the cumulative impact of additional equipment on visual clutter;
- d) the effects on pedestrian and road safety;
- e) the scope for landscaping and screening to reduce the impact of the development on its surroundings;
- f) the scope for sharing of masts and sites and the opportunity to use existing buildings and other structures; and
- g) self-certification to the International Commission on Non-Ionizing Radiation"

B6 - Listed buildings

"To preserve or enhance the character of listed buildings as buildings of special architectural or historic interest, the Council will only grant listed building consent for:

- a) the total or substantial demolition of a listed building where exceptional circumstances are shown that outweigh the case for retention; and for
- b) alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building.

The Council will only grant planning permission for the change of use of a listed building where it considers this would not cause harm to its special architectural or historic interest. The Council will not grant planning permission for development that it considers would cause harm to the setting of a listed building."

6.0 Health & Safety

Recent court cases have confirmed that the *public perception* of health risks can be a material consideration within the land-use planning system. The weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

The most recent government advice regarding mobile telephone technology and health issues is outlined within the revised PPG8 (2001) which states: *"it is the Government's firm view that the planning system is not the appropriate mechanism for determining health safeguards. It remains central government's responsibility to decide what measures are necessary to protect public health. In the Government's view, if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a local planning authority, in processing an application for planning permission or prior approval, to consider further the health aspects and concerns about them."* Paragraph 98, PPG8.

In this instance, Equinix believes that it is not necessary to consider health effects further, as recommended by PPG8. Equinix is committed to ensuring that all new and existing installations are ICNIRP compliant, and consequently it is considered that there is no basis for this application to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. An ICNIRP compliance certificate is enclosed in appendix C. If required, additional information regarding the operation of mobile telephone base stations and health and safety considerations can be provided.

All radio base stations are designed and built to comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) radio frequency (RF) public exposure guidelines. It is the responsibility of the operator that owns an existing installation to ensure the RF fields from their site are designed to meet the ICNIRP guidelines. On a co-located site it is the responsibility of the operator that joins the site to ensure compliance with the guidelines for the whole site.

The Office of Communications – Ofcom, (previously the Radiocommunications Agency) since December 2000 has been conducting random audits in the UK to confirm that radio frequency emissions from mobile phone base stations comply with public exposure guidelines, which are set by ICNIRP. These audits are ongoing. So far, the surveys of base stations which include more than one operator have shown that even maximum levels of exposure are tiny fractions of the guidelines. The National Radiological Protection Board



EQUINIX

(NRPB), now part of the Health Protection Agency (HPA), has also carried out some measurement surveys of radio frequency emissions in the vicinity of mobile phone base stations and other transmitters.

A shared site is likely to have higher emission levels than a single operator site, although each operator might be transmitting at different power levels, different frequencies and different antenna heights and directions. Shared sites are checked and certified for compliance with the international health and safety public exposure guidelines (ICNIRP) and the resulting emission levels will still be many times below them.

Since 2000, Ofcom has undertaken more than 500 random audits of base station emissions; some of these sites were shared or co-located. The measurements from these audits show that emission levels from base stations are typically small fractions of the international health and safety public exposure guidelines (ICNIRP).

All co-located sites, including closely distributed installations, are included within the process used by the network operators to ensure compliance with the international health and safety public exposure guidelines (ICNIRP). As a result of radiowaves decreasing rapidly with distance, (as an approximation, each doubling of distance reduces the field by a quarter), antenna structures can be within a few metres of each other and areas where the public can gain free and reasonable access will still remain well below the ICNIRP health and safety public exposure guidelines.

The network operators design safety zones around the antennas at shared base station sites assuming worst-case conditions, i.e. maximum power levels. In practice, the cumulative power levels are a lot less due to a number of factors including the orientation and height of the antennas and variations in different operators' mobile phone traffic levels at any given time.

7.0 Summary

To summarise the case in favour of the proposals the following points are of relevance:

- With specific regard to telecommunications development, the applicant considers that the proposal accords fully with PPG 8 and the applicable policies of Camden Council Development Plan;
- With specific regard to listed building development, the applicant considers that the proposal accords fully with PPG 15 and the applicable policies of Camden Council Development Plan;
- Site selection was progressed in accordance with the applicants licence obligations, advice in PPG 8 and represents the least environmentally intrusive, technically suitable, available option;
- The BT Tower is a Grade II Listed building which gained its status post the installation of telecommunications equipment on the exterior and roof of the building.
- The level of visual impact has been kept within reasonable technical and construction bounds in which the proposals would appear de-minimus within the context of existing telecommunications already present on the tower given Equinix's proposals to locate externally on the roof;
- Given its de-minimus exterior form in relation to existing telecommunications equipment, it is considered that the proposals are the least damaging form of development and would have a minimal impact upon the listed building;
- In accordance with a precautionary approach as recommended by the Government, the application is accompanied by an ICNIRP certificate, which recognises that the proposed development would meet such guidelines. The ICNIRP also takes into account the cumulative effect from all operators present on the roof.
- The significance of the proposal in the development of the Equinix network is a material consideration and this site is required in order to contribute towards Equinix's obligation to provide 3G coverage to the population.



EQUINIX

APPENDIX A – TECHNICAL JUSTIFICATION

As indicated in the supporting statement Appendix A contains technical justification illustrating the operational and technical requirements for the proposed installation.