



BT Telecommunications PLC

**BT TOWER: Renewal of Existing
Advertisement Consent on a Listed Building**

Heritage, Design & Access Statement

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1.0 INTRODUCTION

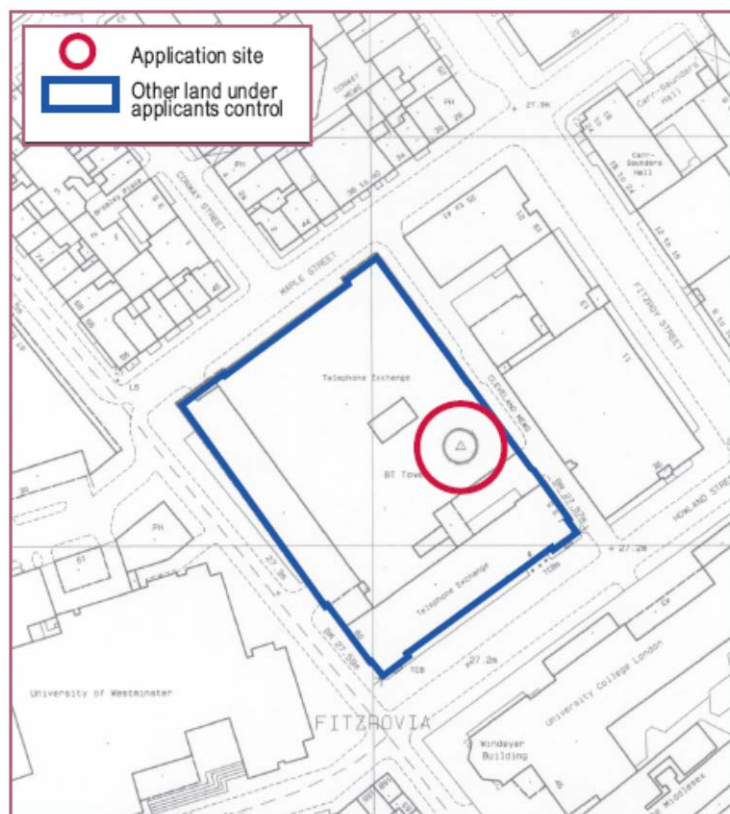
- 1.1 This Heritage, Design and Access Statement accompanies a Listed Building Consent and Advertisement Consent application to renew the existing consent for the LED Information band (Infoband) granted on the BT Tower for a further five year period. The application is being submitted on behalf of British Telecommunications PLC. A separate advertisement consent application is also submitted to seek permission for the renewal of the existing consent.
- 1.2 The applications seek to renew the existing advertisement consent for the BT Tower LED Infoband which was granted in October 2009 for the standard period of five years. The proposals as part of the 2009 listed building and advertisement applications consented the re-facing of the band with new LED lights and the use of the band for displaying animated signage.
- 1.3 Under Class 14 of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007, the continued use of the Infoband in its current form is considered to benefit from deemed consent. However, on the precautionary principle, we wish to formally secure a renewal of the advertisement consent to enable the current infoband to continue to operate as existing.
- 1.4 This statement provides details of the history of the Tower, its changing role, function and appearance as well as a clear justification for the continued use of the Infoband in its current capacity to display information and communications. It therefore performs the role of both a Heritage Statement and Design and Access Statement. Guidance on the requirements for a Design and Access Statement to accompany an application for listed building consent is set out in the National Planning Practice Guidance¹. This application accords with these requirements and LB Camden's list of validation requirements. It also includes necessary information relating to planning policy.
- 1.5 The BT Tower, located at 60 Cleveland Street, Fitzrovia, London, once fulfilled a major requirement in communication technology needs. It was originally designed to host aerials that were used to transmit microwave signals for television broadcasting and trunk telephone calls. In more recent years, the Tower has performed an additional function of displaying text and animations on this historic landmark in London.

¹ Department for Communities and Local Government, 2014. *Planning Policy Guidance*, Paragraph 016, Reference ID 14-016-20140306

2.0 CONTEXT / EVALUATION

Site Location

- 2.1 The BT Tower is within the London Borough of Camden's administrative area. The Tower is located at 60 Cleveland Street, Fitzrovia. It is one of London's most prominent landmarks, standing approximately 177 metres tall; it is a dominant feature of the London skyline. The ground floor entrance to the Tower foyer is situated along Maple Street which runs to the North West of the Tower, to the east of the tower runs Cleveland Mews, Howland Street is to the South East of the Tower. It is also in close proximity to Tottenham Court Road, a principal arterial road in central London, linking Euston Road with Oxford Street. The Tower is, therefore, in a central and accessible location within central London. The position of the Tower in relation to its surrounding built form is illustrated in the site location plan below.



Site Location Plan

- 2.2 Although not within a Conservation Area itself the BT Tower is in close proximity to both the Charlotte Street and Bloomsbury Conservation Areas. It is a local landmark and the BT Tower is one of the most notable views from these Conservation Areas, as specifically identified in the Charlotte Street Appraisal and Management Plan (2008). It therefore makes a positive contribution to the Conservation Areas. There are also clear views of the BT Tower from Charlotte Place, Goodge Place and Tottenham Mews.

- 2.3 Fitzroy Square is also located just to the north of the BT Tower, within the Bloomsbury Conservation Area, this is the only Georgian Square in central London and thus views to and from the Tower and this Square are significant assets to the local environment.

Listed Building Status

- 2.4 The construction of the BT Tower was commissioned by the General Post Office, and construction began in 1961. Owing to its height it is a very notable landmark within London, in particular its presence in the London skyline means it can be seen from almost anywhere within the city. Thus it is a heritage asset to the city and warrants preservation. The BT Tower was Grade II Listed in 2003. It is therefore 'nationally important and of special interest' as defined by English Heritage. The BT Tower requires listed building consent for any substantive changes that are to be made to the building that may affect its special interest. Whilst no substantive changes are proposed, a listed building application is made for completeness, owing to the BT Tower's listed status.
- 2.5 The National Planning Policy Framework (NPPF, 2012) identifies at paragraph 126 the importance of heritage assets and the "*wider social, cultural, economic and environmental benefits*" associated with such structures. The NPPF requires that the significance of any heritage asset that may be affected by a proposal be stated, as well as any contribution made by their setting identified. The impact of a proposal on a heritage asset needs to be assessed, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal (NPPF, para. 128 & 129).

Construction and Technology

- 2.6 The BT Tower was constructed between 1961 and 1964; it was commissioned by the General Post Office to keep pace with telecommunications technology as demand for television broadcasting and telephone communication increased.
- 2.7 Construction of a tower was the preferred option to provide broadband radio links between London and the rest of the country, as the alternative was to create a ring of radio stations on the outskirts of London with broadband links extended to central London by cable. The latter option would have created significant disruption, not least by way of the traffic problems caused by cable laying in and around London.
- 2.8 With the decision taken to construct a single radio tower in the centre of London, the particular site for the building was selected due to the Museum telephone exchange in Howland Street already being a focal point for telecommunications systems. In immediate proximity to this was a site to the rear of Cleveland Mews capable of accommodating a tower.

- 2.9 The Tower itself needed to be of such height that a path, clear of any obstructions, could be provided to allow hundreds of simultaneous radio signals carrying telephone conversations, television programmes and computer data to be transmitted countrywide. The need for the aerials to transmit the microwaves in all directions required the Tower to be circular.
- 2.10 The Tower has continued to change over time to meet communication demands and respond to changing technologies. Although the Tower has become an architecturally iconic building on the London skyline, it was essentially built as a centre for national and international telephone communication by high frequency microwave transmission (BT Tower listing text, www.Camden.gov.uk). The functional requirements dictated its circular shape and height, and subsequently the Tower has been adapted to meet changing requirements.

Role in Defence

- 2.11 The Tower also fulfilled a role in civil defence. The Tower formed part of the Backbone system, acting as a microwave relay tower which could aid point to point microwave transmissions, which were more resilient to nuclear attacks as they operated in the air rather than at ground level. This Backbone system helped bolster national defences at the time of the cold war, as it was less at risk of sabotage.

Current Signage

- 2.12 The original signage on the BT Tower was put in place since when it was granted consent in 1991. In 2003 BT submitted applications for listed building consent and advertisement consent to replace the original signage. LB Camden issued the consent in 2003 which enabled the BT logo to be incorporated into the signage using a new method of projecting coloured lighting, an effect which involved lighting rotating through each of eight colours which produced a subtle wash of fading colours.
- 2.13 The BT Tower was constructed as a platform for telecommunications technology as demand for television broadcasting and telephone communication increased. As microwave transmissions were the new technology at the time, the Tower was based on the concept of enabling microwave signals to be transmitted across the country.
- 2.14 In 2009 BT secured listed building and advertisement consent to update the Infoband to incorporate both advancements in technology and a refreshed message across the band relating to London 2012. This put the Tower at the heart of London in time for the Olympic and Paralympic Games, with the role held by BT as the official communications service provider to the Games. The Tower Infoband provided a countdown from 1000 days to go to the Games, celebrated key dates and turned the tower gold for every medal and reported statistics live.



2003 – Previous signage band



2011 - Current appearance with animated Infoband².

Planning Policy Context

- 2.15 The BT Tower is within the London Borough of Camden's administrative area. The development plan which sets out the policy framework for the Tower comprises The London Plan and LB Camden's Local Development Framework (LDF) including their Core Strategy and Development Policies Document. The National Planning Policy Framework (NPPF) is also a key consideration alongside the Planning Practice Guidance (PPG), together with the 'London View Management Framework' Supplementary Planning Guidance. Being a Grade II listed building there are number of policies which also relate to the Tower. The section below highlights the planning policy context for the BT Tower and relates to the existing form of the infoband, which we are seeking to retain.

National Planning Policy Framework (NPPF) (2012)

- 2.16 The NPPF at chapter 12 sets out the Government's policy framework for conserving and enhancing the historic environment which includes *"all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora"* (NPPF, p.52).

² Image source: The Londonist, available at: <http://londonist.com/2011/10/monday-miscellanea-48.php>

- 2.17 The NPPF identifies the importance of the conservation and enjoyment of the historic environment, including heritage assets (para. 126). Any proposal on a heritage asset should seek to “*avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal*” (para. 129).
- 2.18 The NPPF identifies that heritage assets should be put to viable uses consistent with their conservation (para. 126). A considerable element of the historical significance of the BT Tower relates to its role in representing innovative developments in communications technology, thus its recent planning history demonstrates how the Tower has evolved to keep pace with technological advancements. The proposals comply with the policy requirements of the NPPF.

The London Plan (latest iteration March 2015)³

- 2.19 The London Plan is the Mayor’s Spatial Development Strategy for London. The proposals for the BT Tower are considered to meet the objectives set out in the London Plan.
- 2.20 The ‘London’s Living Places and Spaces’ section of the London Plan is particularly relevant to this application. This emphasizes the importance of making the most of London’s built heritage and ensuring that any new developments respect this built heritage. More specifically policies 7.8 and 7.11 provide further guidance on protecting and managing the built heritage and the strategic views in the city.
- 2.21 A number of strategically important views have been identified in this section of the Plan, within which are various significant landmarks, which will act as a focus for the strategic view. These views will be protected and enhanced by ‘London View Management Framework’ Supplementary Planning Guidance to the London Plan. The BT Tower is a key landmark within a number of strategic views.

London View Management Framework SPG (2012)

- 2.22 The London View Management Framework SPG provides further detail on these strategic views within the City of London. This document seeks to designate, protect and manage the important strategic views across London and the landmarks within them.
- 2.23 The BT Tower is a key landmark within a number of the strategic views including the Alexandra Palace panorama, Parliament Hill panorama, Kenwood panorama and Primrose Hill panorama. The proposed renewal of the advertisement application for the Infoband will as the proposals suggests, renew the existing Infoband already in place on the BT Tower. The Infoband will remain unchanged as part of the application proposals. This will not impact upon on these long distance views of the

³ Greater London Authority, 2014. *The Further Alterations to The London Plan* were published on 10th March 2015

Tower and the proposals are therefore considered to be in line with the management guidelines outlined in this SPG.

LB Camden Core Strategy (adopted November 2010)

- 2.24 Promoting high quality places and supporting the Camden area as a successful component of Central London is a core principle in LB Camden's adopted Core Strategy. A significant element of this is the preservation and enhancement of the area's historic environment (Policy CS9). Policy CS14 emphasises the need to preserve the heritage of the area and this requires the preservation of Camden's heritage assets and also the protection of important views from inside and outside the Borough, in particular those of St Paul's Cathedral and the Palace of Westminster.
- 2.25 In seeking to protect these important city wide views, Camden require that any redevelopment of existing buildings should ensure that replacement buildings are of a height that does not harm the view. The renewal application proposals will not alter the height or overall scale of the BT Tower and it will still retain its position as a landmark building within the strategic views across the city.

LB Camden Development Policies Document (November 2010)

- 2.26 The Development Policies Document supports the adopted Core Strategy and provides additional policies to help determine planning applications in the Borough. Policies DP24 'Securing High Quality Design' and DP25 'Conserving Camden's Heritage' directly support Policy CS14 of the Core Strategy mentioned above. DP24 requires that all development considers both the "*character setting, context and the form and scale of neighbouring buildings*" and particularly where alterations are proposed, the '*character and proportions of the existing building*'. Policy DP25 sets out the Borough's development management policy relating to conserving the areas heritage. In relation to listed buildings this policy sets out that to preserve the Borough's heritage the Council will:
- *prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;*
 - *only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and*
 - *not permit development that it considers would cause harm to the setting of a listed building.*

- 2.27 The applications comply with this policy as it is considered that a significant element of the special interest of the Tower is attributed to its ever changing character and its ability to evolve with technological advances. Therefore the proposed renewal of the advertisement consent for the Infoband will maintain the Tower's telecommunications role.

Camden Local Plan (2015)

- 2.28 Camden is currently consulting on its Draft Local Plan 2015. It is clear from this emerging document that the Council remains committed to the protection of its heritage assets and important views as set out in the London Plan (policies 4B.16 - 4B.18) and the Mayor's London View Management Framework supplementary planning guidance. In seeking to retain the Tower's infoband as existing, the application will continue to be in accordance with the emerging Local Plan.

Evaluation

Site Factors

2.29 The BT Tower is a Grade II listed building and therefore special regard must be awarded to the effect that the proposals will have on the building and its setting. In accordance with paragraph: 012 Reference ID: 18a-012-20140306 of the Planning Practice Guidance, the impact on the significance of the listed building has been assessed within this Heritage, Design and Access Statement.

1. historic and special architectural importance of building
2. physical features that justify its designation
3. building's setting

2.30 Whilst the assessment in the following section of this document reviews the impact on the significance of the listed building, this assessment refers back to the original proposals for the infoband (having now been in place for over 5 years, and benefiting from deemed consent). No changes are proposed to the existing infoband and therefore there will be no change in the impact on the listed building.

2.31 Being situated just outside the Conservation Areas of Charlotte Street and Bloomsbury, the proposals should not have a negative affect on the historic character and architectural quality of these areas.

3.0 PROPOSALS AND JUSTIFICATION FOR THE WORKS

Proposals

- 3.1 The proposals would renew the consent for the existing LED Infoband granted on the BT Tower in 2009 to continue its existing use.

Justification for the Works

- 3.2 This section provides a justification for this renewal of the existing Infoband on the BT Tower.

Changing Role of Telecommunications

- 3.3 The Tower remains a telecommunications tower, although the aerials and microwave technology no longer play any functional role with the advancement in use of fibre-optics. It has held its position in the telecommunications industry by adapting to changes in technology. BT itself has adapted its business remit to keep abreast of technological advancements and has evolved from a fixed-line telephone company to a multi-media communications company. This was an important milestone in reflecting the changing world of communications technology which now covers a much broader spectrum.
- 3.4 The changing telecommunications technology and new BT identity has been reflected in alterations to the Infoband at the top of the Tower in recent years. The recent planning history demonstrates the changes that have been made.

2003: BT unveiled a new corporate identity: the 'connected world' globe. Following which listed building consent was granted for the removal of the BT 'Piper' logo, re-positioning of the BT letters, refacing the Infoband with a new 'flex face' and installation of lighting projection units.

2009: BT updated the technology used in the Infoband at the top of the tower to enable them to project a changing display of information on the band. Listed building and advertisement consent was granted in 2009 for the band to be re-faced with new LED lights to allow for animated signage.

- 3.5 These changes demonstrate how BT as a company constantly evolves in response to technological advances, keeps abreast of high precision technology and uses the Tower to disseminate information. Therefore, although the BT Tower as a centre for microwave telecommunications, has now diminished, the Tower is still an important symbol and an important 'face' for BT. The proposals would renew this 2009 consent to enable the BT Tower to continue to perform this role and function.

4.0 ASSESSMENT OF SIGNIFICANCE AND IMPACT

- 4.1 The BT Tower is a Grade II listed building, situated within a central London location, and is one of the most prominent landmarks on the city's skyline. Therefore any alterations, particularly to the external appearance of the building will have an effect both on the listed building itself and on its setting.

Assessment of Significance

- 4.2 In order to assess the impact on the significance of the BT Tower as a heritage asset it is important to establish the nature and extent of the significance of the Tower. In assessing the significance of the BT Tower as a listed building there are three main factors to consider:

- Historical significance;
- Cultural significance; and
- Architectural / aesthetic significance.

Historical Significance

- 4.3 The BT Tower is one of the most iconic buildings of the 20th Century, and is an important historical landmark within the London skyline. The Tower makes an important contribution to the historic built fabric of the city. The historical significance of the Tower relate to telecommunications and its ability to adapt and reflect changes in technology. The previous upgrades to and continued use of the Infoband are an important part of this ongoing commitment to communications, and in this sense will enhance the historical significance of the Tower.

Cultural Significance

- 4.4 The BT Tower is an important landmark for London and provides a valuable sense of ownership to many London residents. Being such a prominent structure the Tower's cultural significance relates directly to its visual relationship with the rest of the city. Therefore any change to the built fabric of the Tower will impact on its cultural significance. The Tower is also an important symbol for the BT Company, representing their position at the forefront of the telecommunications industry. Therefore the previous upgrades to and continued use of the Infoband are an important representation of how BT develops and evolves with technological advances, thus increasing the Tower's cultural significance.

Architectural Significance

- 4.5 The architectural significance of the BT Tower relates principally to the building's height and cylindrical form. This is what provides the Tower with a high level of visual significance on the London skyline. The overall architectural significance and the Tower will remain unchanged.

Assessment of Impact

- 4.6 The historic and architectural importance of the BT Tower is underpinned by its leading role in the telecommunications world. With its design dictated by the requirements of microwave technology, the cylindrical tower represents the technological advancements of the 1960's. The building's height is a key feature of its historical character, facilitating unobstructed microwave signals to be transmitted across the country, it was constructed to be taller than the other office buildings in the city at the time. The listing also clearly states that the design of the Tower was carefully considered for its elegance.
- 4.7 The historic and architectural importance of the building derives principally from its role in telecommunications, and the buildings tall and elegant form. In terms of the impact of the proposals on the architectural and historical significance of the BT Tower, the renewal of the 2009 consent would not require any physical alterations to the Infoband or to the Tower, as this renewal would extend the advertisement period to enable the Infoband to continue the Tower's role as a communications Tower.
- 4.8 There would therefore be no impact on the external appearance of the Tower or to its' setting. The elegance of the building in terms of its height and massing and consequent importance on the London skyline will also remain undiminished.
- 4.9 The proposals do not propose to alter the external appearance in any shape or form to what is currently in place. Therefore, the proposals would not result in any adverse impacts. The current application simply seeks to continue the existing use and no changes in impact will occur.

5.0 CONCLUSION

- 5.1 The BT Tower is an important iconic building that is prominent in the London skyline. Since its construction in 1965 it has played an important role in showcasing technological advances in telecommunications and has been at the forefront of this sector. Importantly, the Tower has embraced many alterations over the years to enable it to reflect changes in technology and the character of the Tower has evolved with these changes. This current application simply seeks to allow the current use of the infoband to continue.
- 5.2 The significance of the BT Tower as an iconic building is demonstrated by its Grade II listed status and makes it an important heritage asset. However, the listing also protects the building and its setting from any works that may have a detrimental impact. The assessment within the Statement demonstrates that the existing infoband does not impact upon the heritage asset, and this use will remain unchanged as a result of this application.
- 5.3 The current infoband is considered to benefit from deemed consent under Class 14 of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007, therefore this application is submitted on the precautionary principle to formally secure the ongoing existing use of the infoband.



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