

## HERITAGE STATEMENT

This Heritage Statement is submitted to support an application for Full Planning permission a Listed Building Consent at BT Tower, 45 Maple Street, London, W1T 4JZ (NGR - E529159, N181967). In submitting this case specific regard has been given to the statutory tests contained in the Planning (Listed Building and Conservation Areas) Act 1990, published Government guidance.

The BT Tower is a Grade II Listed Building (List Entry Ref – 1350342) which was listed in March 2003 and is found within Fitzroy Square Conservation Area. The List Entry Description references are made to its exterior, most notably the building has a sleek reinforced concrete cylinder and a central chimney like shaft of reinforced concrete. With regards telecommunications development the listing states that *“The aerials and dishes had to be mounted between 365 and 475 feet to achieve adequate ground and obstacle clearance, and were mounted on circular galleries to give the maximum flexibility for adjustment and for subsequent new equipment. The circular shape dictated by the aerials has been retained in the remainder of the tower, to maintain consistency of form and to provide minimum wind resistance.”* The List Entry also notes that *“the telecommunications and servicing equipment is not included in the listing.”*

With regards the historical origins of the building it is said the *“BT Tower was built as a centre of national and international telephone communication by ultra high frequency (UHF) microwave transmission. The site was chosen at the rear of the Museum Telephone Exchange, because this exchange was already the focal point of the telecommunications system and the vision cables network for London, with cable connection to Broadcasting House (q.v. City of Westminster). However, as telephone use soared in the 1950s, and was correctly predicted to increase still more quickly in the 1960s, it became increasingly difficult to provide adequate cable links in central London. Radio telephones using low frequencies had long been used, but the use of high frequencies was in its infancy, and this commitment to the use of high frequencies on a potentially massive scale placed the tower at the forefront of international design. ‘It will represent a considerable advance on any existing international centre’ (Institution of Civil Engineers, 1965, p.33). The sensitive equipment meant that the tower had to be exceptionally stable to maintain the accuracy of the narrow beam transmitters. By means of tests in the National Physical Laboratory wind tunnel, it was stiffened so as to deflect only eleven inches in a hundred mile an hour gale. The cylindrical shape reduced wind resistance.”*

It is also described in the List Entry that *“the height was raised to over 580 feet as building commenced, in order that the tower should be taller than the office buildings then being erected in London. Its waves were relayed across Britain via a series of masts, the nearest being at Harrow. The design was carefully considered for its elegance. ‘The massing is a very welcome addition to the urban landscape’ (Architects’ Journal, 22 June 1966, p.1543).”*

In light of the above it should be appreciated that the scope and complexity of this Heritage Statement is limited given the scale of the proposal and its siting on an established telecommunications facility which is intended to be a hub for transmission dish links. In this regard the main issue of this case will be to assess the effect of the proposed additions may have on the special architectural and historic interests of the listed building as a whole as well as within the context of the Conservation Area. In this regard the Heritage Statement will provide an assessment of: -

- The special architectural or historic interest of the building and a justification of the proposed works;
- The particular physical features of the building that justify its designation as a Listed Building;
- The setting of the building, most notably the context of the Conservation Area.

The National Planning Policy Framework set out the government’s planning policies on the conservation of the historic environment. The National Planning Policy Framework states that; *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*

In light of the above it is considered that any impact in term of alterations to the setting and appearance of the listed building would be neutral due to the nature of the development and the context in which the dishes would be read. Special attention has been paid to preserving the physical features and layout of the building that justify its designation as a listed building, its setting and any features of special architectural or historic interest which it possesses, by limiting the extent of development on the roof to areas of the building which currently accommodate telecommunications development. Indeed the 6no. dishes proposed and their modest scale has kept the extent of development to a minimum and thus reduces the impact on the host building and the wider environment.

Within the context of the existing telecommunications development, it is considered that the extent of the works would constitute small scale alterations, whereby the proposed development will not involve a loss or material change to any original listed feature. Indeed the proposal compliments the intended use of the BT tower as a tall building for telecommunication transmission links. The proposal will reuse and retain existing steelwork and poles whereby it take a similar form and siting to the established dish development on this section of roof. In this regard the addition of 6no. dish antennas affixed to the existing steelwork, would have a limited visual impact as they will be seen alongside existing telecommunications equipment of a similar design and scale. In this regard, it is considered that there would be no significant material harm to the historic fabric or architectural interest of the Grade II listed building. In light of the above and read in conjunction with the dishes being grouped beside likened development, it is considered that the proposed works can be justified and would preserve the existing character and appearance of the building.

The upgrade proposal ensures that the heritage asset of the Listed Building is preserved while also providing the wider benefit of meeting the existing and future demands of a robust Fixed Wireless Access systems network to serve the applicants existing customers. The dishes are pole mounted and do not punctuate the skyline which further reduces their visual impact, hence they would not be visually disruptive to the roofline nor setting of the listed building. Although the new dishes would be seen and their intended use would be apparent, they would not be in marked contrast to the established telecommunications at this level of the BT Tower nor would they obscure views of specific elements of the buildings fabric which is defined in its listing. In this regard it is considered that the proposals would not add untoward clutter at high level that would undermine the roofline and setting of this Grade II Listed Building. Indeed when viewed from the street level in the surrounding area it is considered that the proposed dishes, which are subject of this application, would have very little impact on the overall character and appearance of the listed building and the setting of the Conservation Area and therefore it complies with the requirements of local polices and the National Planning Policy Framework.

Bearing in mind the current use of the building and its listing refers specifically to telecommunications development, it is consider that the historic fabric and character of the building will not be eroded by these changes to the BT Tower, London. In this respect it is considered that the upgrade design and siting at height on a very tall building assists in minimising the impact of the installation to the extent where it is consider that it would preserve the environment of the Conservation Area. It is considered that the proposal has been sensitively designed and sited and would not have a significant impact on the character and appearance of the building and surrounding area. The installation, considered on its own merits, will blend effectively with the existing telecommunications found on the roof and surrounding cityscape and would not be unduly prominent. It is acknowledged that sensitive buildings and environments can be found in the wider area, however it is considered that given the scale of development in the context of a tall building the proposal will have a negligible impact on its surroundings. Overall, it is not considered that the proposed development would harm the character and appearance of the listed building nor the setting of the Conservation Area.