

HERITAGE STATEMENT

1. The guidance on preparing Heritage Statements is set out in Policy HE6 of PPS 5 – *Planning for the Historic Environment*. This makes the point that such statements should be proportionate. Given the nature and size of the listed building and the almost *de minimis* scale of the proposed apparatus, this statement is therefore brief.
2. The BT Tower was included on the statutory list of buildings of special architectural or historic interest on 26 March 2003. The List Entry Number is 1350342 and the category is Grade II.
3. The building is comparatively modern and was built between 1961 -1965. It was included within the statutory list along with several other electronic communication sites, following a general review by English Heritage.
4. The List Entry Description explains why the development of the site was selected for operational reasons and the main tower was designed with the specific purpose of supporting electronic communications apparatus. The height of the tower was designed to be raised above office buildings being erected in London, an essential operational requirement. This feature is especially important in relation to DAB that must be broadcast across the Greater London area.
5. The List Entry Description clearly states that “the telecommunications and servicing equipment is not included in the listing”. No reason is given for this, but it is reasonable to conclude that in listing the building it was recognised that individual items of apparatus were not in themselves of any intrinsic architectural or historic merit; and that it would be inappropriate to include apparatus that must evolve as technology develops and additional services are required.
6. In April 2011, English Heritage published a Listing Selection Guide entitled *Utilities and Communications Structures*. This makes specific reference to the BT Tower stating:

“The introduction of a countrywide network of radio communications towers from the 1950’s has provided new landmarks of the second half of the twentieth century. Such structures often combine perfect technical performance with architectural elegance and structural audacity. The Government Post Office also experimented with radio waves in a series of land-based transmitters centred on the British Telecom (formerly GPO) Tower, London, of 1964 (listed Grade II), which has also become a landmark feature. It was built as a centre of national and international telephone communication by ultra high frequency (UHF) microwave transmission, and was the first tall tower in Europe to be built for high frequency waves: it also fulfilled a national security role.”

7. In setting out specific considerations when considering communications buildings for designation, the document goes on to point out:

“In general, in such buildings survival rates of original technology will be very low and thus listing is likely to concern itself primarily with the architectural setting of these facilities”..

8. From this, one can discern that the key interest of the building is its architectural significance that combines technical performance and the resultant landmark feature.
9. PPS 5 and The Mayor's Plan for London provide the national and regional policy background. The Council's Core Strategy and Development Control policies place that within the context of Camden and provide the detailed criteria against which a proposal must be assessed.
10. The essence of the policy guidance is the same as the statutory duty to preserve or enhance our heritage assets. There is no better way to preserve or enhance a heritage asset than to use it for the purpose for which it was originally designed and intended. This is particularly the case as the comparatively small scale apparatus proposed will not in any way cause harm to the appearance of the building, its setting, or its landmark appearance. To the contrary the proposed apparatus will be wholly consistent with the shape and form of the BT Tower and take particular advantage of its technical performance.
11. The proposal therefore fully accords with all relevant guidance and merits the grant of Listed Building Consent.

