BEACONCOMMS
TELECOMMUNICATIONS INFRASTRUCTURE
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SUPPLEMENTARY INFORMATION, DESIGN & ACCESS STATEMENT

1. Site Details

Site Name:	Cleveland Street	Site Address:	BT Tower Cleveland Street Howland Street Marylebone London W1T 4JZ
National Grid Reference:	E: 529215 N: 181890		
Site Ref:	CM105 13832	Site Type:[1]	Macro

2. Pre-Application Check List - Site Selection (for New Sites only)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	
If no explain why:		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why:		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority	Information not available
Name of Contact:	
Summary of any issues raised:	

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	None issued	
Was there pre-application contact:		
Date of pre-application contact:		
Name of contact:		
Summary of outcome/Main issues raised: As this is an upgrade of an existing telecommunications cell site and the excessive costs of pre-application consultation with the Council, this has not been progressed at this time		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green
The site was rated as green due to its location and the existence of existing communications apparatus.	

School/College

Location of site in relation to school/college *(include name of school/college):* No schools in the nearby area.
Outline of consultation carried out with school/college *(include evidence of consultation):* N/A
Summary of outcome/Main issues raised: N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response:		

Developer's Notice

Copy of Developer's Notice enclosed?		No
Date served:	N/A Full Planning	

3.0 Proposed Development

The proposed site – DESIGN & ACCESS
The application site is a commercial building located in Camden Town Centre. The wider area is predominantly commercial and is characterised by large, tall buildings. The application site is the roof of a large building occupying a corner position, adjacent to the

intersection of three busy roads. The building features a Grade II listed BT tower on its roof. In addition, existing telecommunications apparatus is located on the roof.

On its north to east elevation is a highway. On its east to south elevation is a highway with a wide footpath lined with large mature trees. From south to west and west to north are also highways. The telecoms apparatus has been situated on the roof of the application building for some time, without causing issue to the surrounding environment.

The height of the existing building is approximately eight storeys. This height would ensure that the proposed increase in height of the roof apparatus would not have an impact on either the appearance of the existing street scene, or the character appearance and setting of the listed building.

To the north of the site is Fitzroy Square Conservation Area. Both this conservation area and the area outside, where the application building is located, are covered by Fitzrovia Area Action Plan. The height of the application building, and the relatively low height of the proposed telecoms equipment would ensure there would be no impact on the character or appearance of the adjacent conservation area.

Views of the proposed equipment from the conservation area would not be affected by the increase in height of the proposed apparatus. Views to the conservation area from the highways adjacent to the application would also be unaffected. This is due to the height of the existing building and that views of the conservation area would be focussed on ground level, rather than at around eight storeys high.

The height of the proposed apparatus is the minimum capable of providing the technological improvements sought.

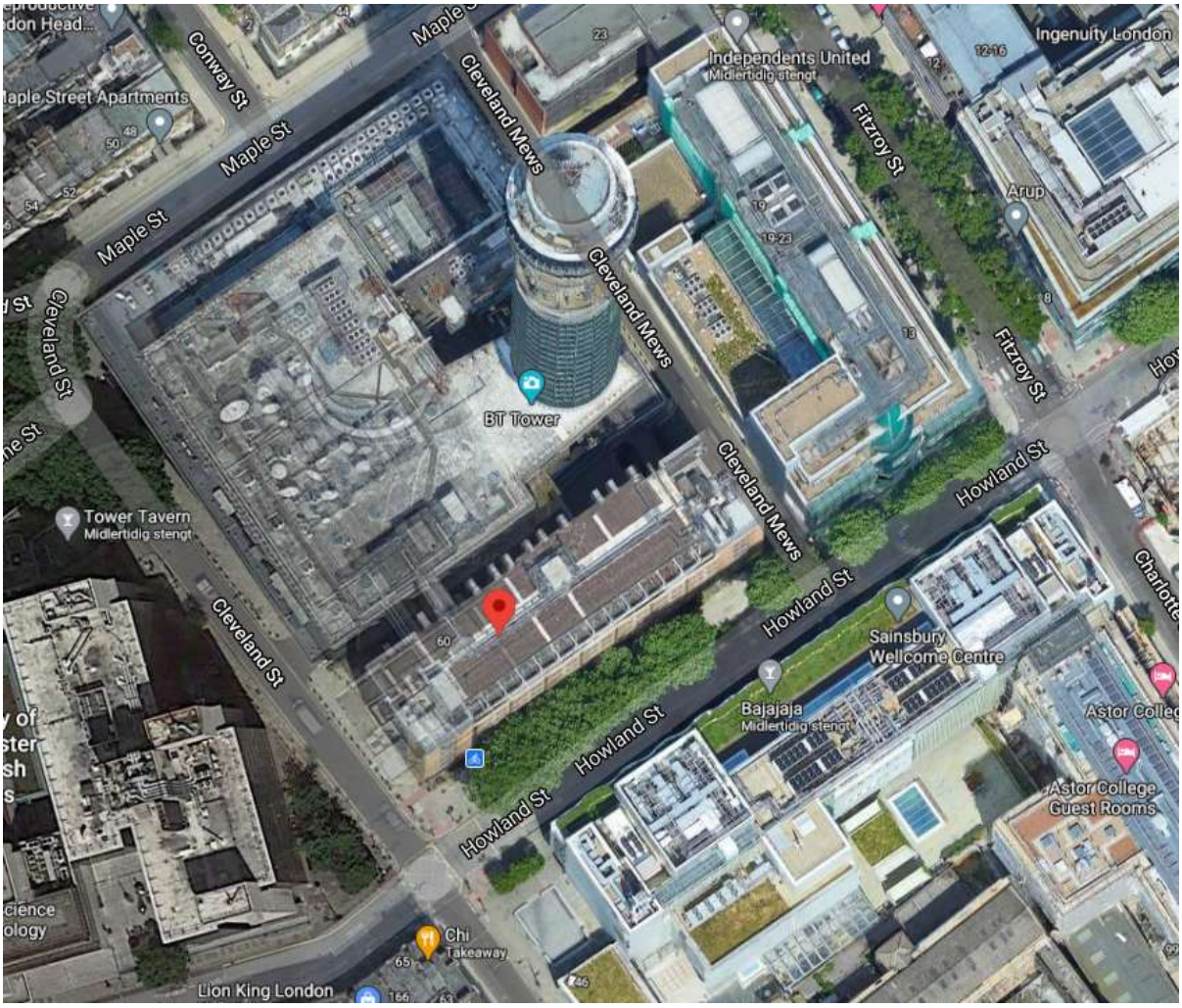
Following the COVID-19 pandemic, it is imperative that telecommunications is not only maintained but also upgraded to ensure capacity and real time data is at the forefront. Telecommunications is considered as a critical service as it provides data to network operatives, field engineers, call centre staff, IT and data infrastructure, 999 and 111 staff. The operator EE has dedicated its entire 4G network to the emergency services, meaning it is crucial that 2G and 3G networks are fully supported by an adequate number of sites.

A certificate has been included with the application confirming compliance with ICNIRP guidelines.

Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design are considered to provide the optimum solution in this instance.

Access due to the nature of the site is restricted to authorised personnel only

Aerial view of the proposed site



Street views:

Current Telecommunications Use/ The Future

Since the introduction of the mobile networks, mobile operator networks have been under increased pressure to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives. Mobile is the next generation of technology to enable increased connectivity with increased data speeds.

The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The NPPF recognises that *"Advanced high quality and reliable telecommunications infrastructure is essential to economic growth*…", as will be considered in more detail below. The current proposal will provide positive benefits to the transport network here which will far outweigh any perceived negative visual impacts.

EE (UK) LTD. Has produced an advisory note entitled Mobile and Future Technology- Delivering the UK's Telecoms Future and this is enclosed as part of the application.

Type of Structure: rooftop apparatus	
Description: The removal of redundant antennas and equipment on the 24.6m rooftop, being replaced by 2x roof pods on the northeast and northwest edges of the rooftop supporting 4 and 2 antennas with associated equipment	
Overall Height:	29.97m
Height of existing building *(where applicable):*	24.6m
Equipment Housing:	
Length:	As per attached drawings
Width:	
Height:	
Materials *(as applicable):*	

Tower/mast etc. – type of material and external colour:	As per attached drawings
Equipment housing – type of material and external colour:	As per attached drawings

The proposal has been specifically designed for the site in question and is essential in order to introduce the required technologies to the area.

Ensuring a full and reliable telecoms network has become even more critical following the COVID-19 pandemic. There is both a huge increase in people working from home and children using devices to study at home, whilst schools are closed. This operator has currently designated its 4G service for the exclusive use of emergency services staff, meaning that further sites are necessary to support the existing networks, in addition to contributing to the introduction of 3G/4G technologies.

It is anticipated that many people will continue working from home even after restrictions have been lifted. Therefore, a reliable network providing a high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal disruption. Furthermore, this would support critical emergency services and health providers in their essential roles.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements needed by the operator. It is necessary for the height of the structure to ensure that the topography of the landscape does not have an unacceptable impact upon mobile signal quality and that the structure is able to support the mobile antenna and other apparatus. Ground-based equipment has been sited with the ideal to keep visual impacts to a minimum.

Full consideration has been given to alternative sites and other existing masts in the vicinity. It is concluded that there are no suitable rooftop solutions or land-based tower options in the area that operators would meet the technical needs of the operator. The proposed location and design are considered to provide the optimum solution in this instance.

The height of the proposed apparatus is the minimum capable of providing the technological improvements sought whilst satisfying ICNIRP requirements. It should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF.

4.0 Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) * International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and	**Yes**	No

implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		

Frequency	To be provided on request
Modulation characteristics[2]	To be provided on request
Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, EE operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of EE's network, the radio base station that is the subject of this application will be configured to operate in this way.	To be provided on request
Height of antenna (m above ground level)	29.97m

[2] The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase Modulation.
The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.

Background:

Section 10 of the NPPF sets out the Government's general overview regarding supporting high quality communications infrastructure, recognising that advanced, high quality communications infrastructure is essential for sustainable economic growth.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive; calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles devices and phones will not work.

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchange buildings by cables or wireless technology such as microwave dishes, to create the network. The area each base station covers is called a "cell". Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular, more base stations are needed to ensure continuous coverage.

It is imperative that support is given to the introduction of new infrastructure to allow new technology which will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds. This will enable places to remain competitive and will support the Government's ambition for the UK to become a world leader in telecommunications technologies and development. Any perceived negative impacts will be far outweighed by the overall benefits of the scheme and the location of the apparatus on a building which already supports extensive telecommunications equipment will minimise its potential impact on the immediate environment.

All EE installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission.

Alternative sites considered and not chosen.

This is an upgrade of existing infrastructure and therefore other sites were not considered. In line with existing national planning policy, it was considered most appropriate to upgrade existing equipment, rather than developing a new site

Additional relevant information

Planning Policy Assessment

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies of the adopted Statutory Development Plan, unless material considerations indicate otherwise.

National Planning Policy Framework (2019)

The National Planning Policy Framework (NPPF) was published in February 2019 and supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and how these are to be applied in relation to all planning applications.

Under Section 6 paragraph 80 the NPPF advises…." *Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."* In terms of supporting a prosperous rural economy paragraph 84…" *The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."*

The application would upgrade existing telecoms equipment which has been located at the same site for a number of years. This equipment would contribute to a fast and reliable network and allow for the introduction of existing 5G equipment in the area.

In section 10 of the new NPPF, the document seeks to support *"Advanced, high quality and reliable communications infrastructure"* ensuring that it is *"essential to economic growth and social wellbeing"*. It advises that *"planning policies and decisions should support the expansion of electronic communications networks including next generation mobile technology (such as Mobile) and full fibre broadband connections."* Paragraph 113 states" *the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new Mobile networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."*

The proposal is for upgraded telecommunications equipment at an existing site. This would aid in the development of a reliable and fast network. This would benefit the local community, including

businesses, residents and visitors to the area. The Government-issued COVID-19 guidance (released 2 April 2020) states…*'Now, more than ever, the country is reliant on fixed line and mobile communications networks. Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.*

Paragraph 114 continues" *Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*

a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and

b) They have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.

The scheme will not cause any undue impact on the services outlined above and fully complies with ICNIRP standards. An ICNIRP certificate is enclosed with the application. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE Ltd to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF. It is considered the proposed development complies with the broad aims of the NPPF. The equipment has been sympathetically designed, with the structure being kept to the minimum practicable height for the required to accommodate Mobile network coverage, thus enhancing the provision of local community facilities and services without detracting from local amenity. More sensitive sites were specifically avoided in order to minimise the impact of the proposed mast.

Section 12 of the NPPF seeks to achieve well-designed places.

128. *Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.*

The applicant has taken the decision to upgrade the apparatus on an existing building, rather than developing a new site. This is in line with national planning policy and contributes to the aim of achieving well-designed places.

Local Planning Policy

The statutory development plan for the area is comprised of The London Plan (2016), Camden Local Plan (2017) and Fitzrovia Area Action Plan (2014).

The London Plan, March 2016

"POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY

Strategic

A. The Mayor and the GLA Group will, and all other strategic agencies should:

a) facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals.

b) Support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits."

The application site is located within the centre of Camden in a predominantly commercial area. The existing telecoms infrastructure needs to be upgraded in order to maintain a fast and reliable telecommunications network. This will benefit both the local area and the wider area as this equipment would form part of a wider network. The upgraded apparatus would allow for the introduction of 5G technologies, which would allow for the development of a faster and more reliable network, supporting local businesses and the local economy. It is therefore contended that this proposal complies with this policy.

"POLICY 7.5 PUBLIC REALM

Strategic

A London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

Planning decisions

B Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high-quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate.

C Development should incorporate local social infrastructure such as public toilets, drinking water

fountains and seating, where appropriate. Development should also reinforce the connection between public spaces and existing local features such as the Blue-Ribbon Network and parks and others that may be of heritage significance."

The existing telecommunications equipment has been in situ for a considerable length of time without causing any undue harm to its setting. There is a need for high quality, up to date telecommunications in order to secure the future prosperity of the area in general and ensure that the needs of the community and businesses within the area are met.

Despite the listed nature of the building, the proposal would not have an unacceptable impact on its character, appearance or setting. Whilst there would be an increase in the height of the existing building with the proposed apparatus in place, it would not appear overbearing or prominent within the existing skyline. This is due to the application building not being located within an established street scene of adjacent buildings of the same height. The relatively small scale of the proposed equipment would not appear overbearing within the existing street scene and would not be a prominent feature. In these circumstances it is contended that the policy has been complied with.

The proposed increase in height is the minimum capable of providing the technological improvements sought. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology. This will enable places to remain competitive in and will support the Government's ambition for the UK to become a world leader in 5G. Taking these factors into account, it is considered that this proposal would comply with this policy.

Camden Local Plan (2017)

Policy A1 Managing the impact of development

The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. We will: a. seek to ensure that the amenity of communities, occupiers and neighbours is protected; b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities; c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and d. require mitigation measures where necessary. The factors we will consider include: e. visual privacy, outlook; f. sunlight, daylight and overshadowing; g. artificial lighting levels; h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans; i. impacts of the construction phase, including the use of Construction Management Plans; j. noise and vibration levels; k. odour, fumes and dust; l. microclimate; m. contaminated land; and n. impact upon water and wastewater infrastructure.

To the north of the site is Fitzroy Square Conservation Area. Both this conservation area and the area outside, where the application building is located, are covered by Fitzrovia Area Action Plan. The height of the application building, and the relatively low height of the proposed telecoms equipment would ensure there would be no impact on the character or appearance of the adjacent conservation area.

Views of the proposed equipment from the conservation area would not be affected by the increase in height of the proposed apparatus. Views to the conservation area from the highways adjacent to the application would also be unaffected. This is due to the height of the existing building and that views of the conservation area would be focussed on ground level, rather than at around eight storeys high.

To the north of the site is Fitzroy Square Conservation Area. Both this conservation area and the area outside, where the application building is located, are covered by Fitzrovia Area Action Plan. The height of the application building, and the relatively low height of the proposed telecoms equipment would ensure there would be no impact on the character or appearance of the adjacent conservation area.

The application site is the roof of a large building occupying a corner position, adjacent to the intersection of three busy roads. The building features a Grade II listed BT tower on its roof. In addition, existing telecommunications apparatus is located on the roof.

On its north to east elevation is a highway. On its east to south elevation is a highway with a wide footpath lined with large mature trees. From south to west and west to north are also highways. The telecoms apparatus has been situated on the roof of the application building for some time, without causing issue to the surrounding environment.

Given these circumstances, it is contended that this policy has been complied with.

Policy D1 Design

The Council will seek to secure high quality design in development. The Council will require that development: a. respects local context and character; b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage; c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation; d. is of sustainable and durable construction and adaptable to different activities and land uses; e. comprises details and materials that are of high quality and complement the local character; f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; g. is inclusive and accessible for all; h. promotes health; i. is secure and designed to minimise crime and antisocial behaviour; j. responds to natural features and preserves gardens and other open space; k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping, l. incorporates outdoor amenity space; m. preserves strategic and local views; n. for housing, provides a high standard of accommodation; and o. carefully integrates building services equipment. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. Tall buildings All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to: p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline; q. the historic context of the building's surroundings; r. the relationship between the building and hills and views; s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and t. the contribution a building makes to pedestrian permeability and improved

public accessibility. In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability. Public art The Council will only permit development for artworks, statues or memorials where they protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design. Excellence in design The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.

To the north of the site is Fitzroy Square Conservation Area. Both this conservation area and the area outside, where the application building is located, are covered by Fitzrovia Area Action Plan. The height of the application building, and the relatively low height of the proposed telecoms equipment would ensure there would be no impact on the character or appearance of the adjacent conservation area.

Views of the proposed equipment from the conservation area would not be affected by the increase in height of the proposed apparatus. Views to the conservation area from the highways adjacent to the application would also be unaffected. This is due to the height of the existing building and that views of the conservation area would be focussed on ground level, rather than at around eight storeys high.

To the north of the site is Fitzroy Square Conservation Area. Both this conservation area and the area outside, where the application building is located, are covered by Fitzrovia Area Action Plan. The height of the application building, and the relatively low height of the proposed telecoms equipment would ensure there would be no impact on the character or appearance of the adjacent conservation area.

The application site is the roof of a large building occupying a corner position, adjacent to the intersection of three busy roads. The building features a Grade II listed BT tower on its roof. In addition, existing telecommunications apparatus is located on the roof.

On its north to east elevation is a highway. On its east to south elevation is a highway with a wide footpath lined with large mature trees. From south to west and west to north are also highways. The telecoms apparatus has been situated on the roof of the application building for some time, without causing issue to the surrounding environment.

Given these circumstances, it is contended that this policy has been complied with.

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets. Designated heritage assets Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
a. the nature of the heritage asset prevents all reasonable uses of the site;
b. no viable use of the heritage asset itself can be found in the medium term through appropriate

marketing that will enable its conservation;
c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
d. the harm or loss is outweighed by the benefit of bringing the site back into use. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm. Conservation areas Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:
e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

Listed Buildings
Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:
i. resist the total or substantial demolition of a listed building;
j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Archaeology
The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate. Other heritage assets and non-designated heritage assets The Council will seek to protect other heritage assets including no designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

To the north of the site is Fitzroy Square Conservation Area. Both this conservation area and the area outside, where the application building is located, are covered by Fitzrovia Area Action Plan. The height of the application building, and the relatively low height of the proposed telecoms equipment would ensure there would be no impact on the character or appearance of the adjacent conservation area.

Views of the proposed equipment from the conservation area would not be affected by the increase in height of the proposed apparatus. Views to the conservation area from the highways adjacent to the application would also be unaffected. This is due to the height of the existing building and that views of the conservation area would be focussed on ground level, rather than at around eight storeys high.

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The application site is the roof of a large building occupying a corner position, adjacent to the intersection of three busy roads. The building features a Grade II listed BT tower on its roof. In addition, existing telecommunications apparatus is located on the roof. The proposed increase in height of telecoms equipment, from the upgrade, would not impact the character, appearance or setting of the listed building or the area in which it is located.

On its north to east elevation is a highway. On its east to south elevation is a highway with a wide footpath lined with large mature trees. From south to west and west to north are also highways. The telecoms apparatus has been situated on the roof of the application building for some time, without causing issue to the surrounding environment.

Given these circumstances, it is contended that this policy has been complied with.

Policy G1 Delivery and location of growth

The Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

Delivery of growth
The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by:
a. supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;
b. resisting development that makes inefficient use of Camden's limited land;
c. expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and
d. supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

Growth in Camden will be expected to help contribute towards achieving the strategic objectives of the Local Plan and help deliver the Council's priorities set out in supporting text below. This Plan seeks to meet Camden's objectively assessed needs to 2031 for:
• 16,800 additional homes (see Policy H1 Maximising housing supply);
• 695,000sqm of office floorspace (see Policy E1 Economic development); and
• c30,000sqm of retail floorspace (see Policy TC1 Quantity and location of retail development).

The application site is located within the centre of Camden in a predominantly commercial area. The existing telecoms infrastructure needs to be upgraded in order to maintain a fast and reliable telecommunications network. This will benefit both the local area and the wider area as this equipment would form part of a wider network. The upgraded apparatus would allow for the introduction of 5G technologies, which would allow for the development of a faster and more

reliable network, supporting local businesses and the local economy. It is therefore contended that this proposal complies with this policy.

Policy E1 Economic development

The Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. We will:
a. support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;
b. maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;
c. support local enterprise development, employment and training schemes for Camden residents;
d. encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;
e. support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan;
f. direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031;
g. support Camden's industries by:
i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;
ii. supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;
iii. safeguarding the Kentish Town Industry Area; iv. promoting and protecting the jewellery industry in Hatton Garden;
h. expect the provision of high speed digital infrastructure in all employment developments; and
i. recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.

The application site is located within the centre of Camden in a predominantly commercial area. The existing telecoms infrastructure needs to be upgraded in order to maintain a fast and reliable telecommunications network. This will benefit both the local area and the wider area as this equipment would form part of a wider network. The upgraded apparatus would allow for the introduction of 5G technologies, which would allow for the development of a faster and more reliable network, supporting local businesses and the local economy. It is therefore contended that this proposal complies with this policy.

Policy E2 Employment premises and sites

The Council will encourage the provision of employment premises and sites in the borough. We will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy. We will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:
a. the site or building is no longer suitable for its existing business use; and
b. that the possibility of retaining, reusing or redeveloping the site or building for similar or

alternative type and size of business use has been fully explored over an appropriate period of time. We will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that:
c. the level of employment floorspace is increased or at least maintained;
d. the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy;
e. it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy and will be to a sustainable location;
f. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
g. the scheme would increase employment opportunities for local residents, including training and apprenticeships;
h. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and
i. for larger employment sites, any redevelopment is part of a comprehensive scheme.

The application site is located within the centre of Camden in a predominantly commercial area. The existing telecoms infrastructure needs to be upgraded in order to maintain a fast and reliable telecommunications network. This will benefit both the local area and the wider area as this equipment would form part of a wider network. The upgraded apparatus would allow for the introduction of 5G technologies, which would allow for the development of a faster and more reliable network, supporting local businesses and the local economy. It is therefore contended that this proposal complies with this policy.

Fitzrovia Area Action Plan (2014)

Policy F1 – Planning decisions in Fitzrovia

When considering development proposals within the boundary of the Fitzrovia Area Action Plan the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with up-to-date land use, design and development principles in the Fitzrovia Area Action Plan (and with the up-to-date policies in the Camden Core Strategy, Camden Development Policies 2010 and, where relevant, any neighbourhood plans) will be approved without delay and applications that conflict will be refused, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

• any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

• specific policies in that Framework indicate that development should be restricted.

The application site is located within the centre of Camden in a predominantly commercial area. The existing telecoms infrastructure needs to be upgraded in order to maintain a fast and reliable telecommunications network. This will benefit both the local area and the wider area as this equipment would form part of a wider network. The upgraded apparatus would allow for the introduction of 5G technologies, which would allow for the development of a faster and more reliable network, supporting local businesses and the local economy.

The application site is a commercial building located in Camden Town Centre. The wider area is predominantly commercial and is characterised by large, tall buildings.

The application site is the roof of a large building occupying a corner position, adjacent to the intersection of three busy roads. The building features a Grade II listed BT tower on its roof. In addition, existing telecommunications apparatus is located on the roof.

On its north to east elevation is a highway. On its east to south elevation is a highway with a wide footpath lined with large mature trees. From south to west and west to north are also highways. The telecoms apparatus has been situated on the roof of the application building for some time, without causing issue to the surrounding environment.

The height of the existing building is approximately eight storeys. This height would ensure that the proposed increase in height of the roof apparatus would not have an impact on either the appearance of the existing street scene, or the character appearance and setting of the listed building.

To the north of the site is Fitzroy Square Conservation Area. Both this conservation area and the area outside, where the application building is located, are covered by Fitzrovia Area Action Plan. The height of the application building, and the relatively low height of the proposed telecoms equipment would ensure there would be no impact on the character or appearance of the adjacent conservation area.

Views of the proposed equipment from the conservation area would not be affected by the increase in height of the proposed apparatus. Views to the conservation area from the highways adjacent to the application would also be unaffected. This is due to the height of the existing building and that views of the conservation area would be focussed on ground level, rather than at around eight storeys high.

It is therefore contended that this proposal complies with this policy.

The vision for Fitzrovia is: To optimise the benefits of future growth to create a harmonious co-existence of uses and users To achieve this vision, we have developed four objectives:

• ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses and addresses the its impact of growth on residential amenity;

• supporting the residential community by providing a range of facilities, services and places to meet resident's existing and future needs and protecting and enhancing residential amenity and

quality of life; • creating a high quality physical environment; and

• ensuring an environmentally sustainable future.

The application site is located within the centre of Camden in a predominantly commercial area. The existing telecoms infrastructure needs to be upgraded in order to maintain a fast and reliable telecommunications network. This will benefit both the local area and the wider area as this equipment would form part of a wider network. The upgraded apparatus would allow for the introduction of 5G technologies, which would allow for the development of a faster and more reliable network, supporting local businesses and the local economy.

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On its north to east elevation is a highway. On its east to south elevation is a highway with a wide footpath lined with large mature trees. From south to west and west to north are also highways. The telecoms apparatus has been situated on the roof of the application building for some time, without causing issue to the surrounding environment.

The height of the existing building is approximately eight storeys. This height would ensure that the proposed increase in height of the roof apparatus would not have an impact on either the appearance of the existing street scene, or the character appearance and setting of the listed building.

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It is therefore contended that this proposal complies with this policy.

CONCLUSION

There is a requirement for EE to provide advanced telecommunications technologies to this dense urban and highly active area. Network planners have identified a need for an installation here with coverage capacity required for the vicinity and the proposed development will address this identified need and continued customer demands.

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application explains the technical need for the installation to provide improved customer service.

Following the current COVID-19 pandemic, it is anticipated that many people will continue working from home even after restrictions have been lifted. Therefore, a strong network providing a reliable and high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal and economic disruption. Furthermore, the proposed mast would contribute to a telecommunications network supporting emergency services and local health providers. These are critical services in the current pandemic climate.

In terms of siting and design, it is considered that the proposal responds well to the character and appearance of the local environment and will not have an unacceptable adverse impact on the application site or the surrounding area. The design is of a high standard and will not detract significantly from the existing visual and environmental character of the area. In all these circumstances it is concluded that there are no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.