



Clarke Telecom Limited
Unit E, Madison Place,
Northampton Road, Manchester,
M40 5AG, UK
www.clarke-telecom.com

T: +44 (0) 161 785 4500
F: +44 (0) 161 785 4501

Our ref: CTIL_242201_TF_81554

Rt Hon Keir Starmer MP
House of Commons
London
SW1A 0AA

Email: keir.starmer.mp@parliament.uk

VIA EMAIL

07 February 2020

Dear Mr Starmer

PROPOSED TELECOMMUNICATIONS BASE STATION, COMPRISING THE INSTALLATION OF 10 NO ANTENNA, 2 NO DISHES, EQUIPMENT CABINETS AND ANCILLARY DEVELOPMENT THERETO AT CTIL_242201_20_TF_81554_VF_15320 1 ST GILES HIGH STREET, LONDON, WC2H 8AG NGR E: 529969 N: 181329

Telefónica UK Limited has entered into an agreement with Vodafone Limited pursuant to which the two companies plan to jointly operate and manage a single network grid across the UK. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (Cornerstone) which is a joint venture company owned by Vodafone Limited and Vodafone Limited.

This agreement allows both organisations to:

- pool their basic network infrastructure, while running two, independent, nationwide networks
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

This letter is sent to you in the pre-planning application consultation phase of the development for a mobile phone base station site and is simply intended to keep you informed and advised of the proposed development in your area prior to any planning application being submitted. However, if you do wish to submit comments or have been contacted by your constituents in relation to this matter and wish to send us comments on their behalf, please feel free to do so via the following address:

Community Consultation & EMF Enquiries, Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA

Email: community@ctil.co.uk

What follows is a summary of the proposal and some further information that might be of use.

Summary of the proposal



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Cornerstone and Telefonica are in the process of progressing a suitable site in the High Street / New Oxford Street area of London for a replacement radio base station. We aim to work with you to progress a proposal that is both acceptable to your authority and meets Telefonica's technical network requirements. This approach accords with Telefonica's Best Practice Commitments to ensure consultation with Local Planning Authorities and other appropriate key stakeholders.

As part of Telefonica's continued network improvement program, there is a specific requirement for a replacement rooftop installation at 1 St Giles Street to replace the nearby radio base station which was lost at Castlewood House. The site provider at Castlewood House served the operator with a notice to quit to enable his plans to redevelop the site to come to fruition. The original site has been decommissioned and is now off air. There is currently no coverage for Telefonica in this busy location within the capital. There is therefore an urgent need to provide replacement coverage as soon as possible, as the operator's customers are unable to utilize their handheld devices in this cell area contrary to the operator's legal requirements to provide a service and the customers reasons for purchasing their handheld devices. A replacement installation in this location will ensure that the latest high quality 2G, 3G and 4G service provision is maintained and enhanced in and around New Oxford Street.

Notably, this is one of three sites required by Cornerstone, Vodafone and Telefonica to provide replacement coverage for the existing site at Castlewood House.

A number of options have been assessed in respect of the site search process but we consider the best option for the replacement installation to comprise the installation of 10 no. antennas, 2 no. transmission dishes, equipment cabinets and ancillary development thereto at **CTIL 242201 20 TF 81554 VF 15320 1 ST GILES HIGH STREET, LONDON, WC2H 8AG NGR E: 529969 N: 181329**. This is because this building is opposite the original building that provided high quality, advanced communications technology but is no longer available to be used and has been decommissioned. In order to provide equivalent replacement coverage the replacement site needs to be as close as possible to the former site, so it can fill the specific hole in coverage in the operator's network.

Our preferred design is to position the antenna on the upper roof level of 1 St Giles Street (46.50m AGL). Utilising an existing building is in complete accordance with national planning guidance, as the proposed antennas are out of the general eye line of the casual onlooker. Thus the visual presence of the radio base station will be minimised. This is especially so as the height of the host building is some 46.50m and the top height of the antennas is circa 49.00m. Therefore, the antennas will barely be noticeable once in situ even if the general public were to crane their necks upwards in an unnatural stance to see glimpses of the new antennas. The area is already established with rooftop antennas as Castlewood House opposite had the operator's equipment on it, up until recently. The proposed antennas will appear very similar to these. The building mass of 1 St Giles Street will also ensure that the antennas will not be overly visible from ground level.

The other site options that were considered and then discounted are as follows:

- **Rooftop – Castlewood House, 77-91 New Oxford Street, London, WC1A 1DG NGR E: 529984 N: 181402**
This is the NTQ site where the operator was originally located. An NTQ was served, the site has been decommissioned and is currently off air. This site is no longer available hence the need for a replacement site.
- **Rooftop – St Giles in the Fields Church, High Street, London, WC2AH 8LG NGR E: 529961 N: 181267**
This building is too low to provide the necessary coverage to the target coverage area. The surrounding tall buildings would prevent the antennas from being effective and an additional installation would still be required. There is also insufficient space in the church spire to accommodate a radio base station.
- **Rooftop – Centre Point, New Oxford Street, London, WC1A 1DD NGR E: 529873 N: 181371**
This site is being redeveloped and it is also listed. Therefore the site is unavailable to the operators. Due to its listed status the preferred option would also have less impact as it is not a designated heritage asset.
- **Rooftop – Fairgate House, New Oxford Street, London, WC1A 1HB NGR E: 529983 N: 181435**
The building is lower than the surrounding properties. Therefore the antenna signal would be blocked. This site is therefore not suitable.
- **Rooftop – Burtons, 118/132 New Oxford Street, London, WC1A 1HL NGR E: 529850 N: 181399**
This property is listed and therefore would have a greater impact on the character and appearance of a heritage asset than the preferred option which is not statutorily protected. The site also borders the next cell. A radio base station in this location would interfere with the existing radio base stations operation causing it not to work as effectively. This would be detrimental to the operation of the network in this area. As the site is on the edge of the search area it would not provide as good a coverage as the preferred option. This site has therefore been discounted for these reasons.
- **Rooftop – 55 New Oxford Street, London, WC1A 1BS NGR E: 530057 N: 181418**
A site in this location would provide significant uplift in coverage due to the operators existing network configuration. As such, it would not provide the necessary coverage to the target coverage area for Telefonica. It has therefore been discounted for this reason.
- **Rooftop – 64-76 New Oxford Street, London, WC1A 1BS NGR E: 530025 N: 181455**
A site in this location would provide significant uplift in coverage due to the operators existing network configuration. As such, it would not provide the necessary coverage to the target coverage area for Telefonica. It has therefore been discounted for this reason.

In line with Best Practice principles we have shared these details with planning officers, the Ward councillors and the local London AM Andrew Dismore and MP Keir Starmer.

ICNIRP Compliance

All Telefónica 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



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also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission.

Radio technology and health

Useful information sources on this include:

Code of Best Practice on Mobile Network Development

<http://www.mobileuk.org/cms-assets/documents/259876-147086.code-of-best-practice-2016-edition-pub>

National Planning Policy Framework www.communities.gov.uk

World Health Organisation – Electromagnetic Fields www.who.int/peh-emf/en

International Commission on Non Ionising Radiation Protection www.icnirp.de

I trust all is clear from the enclosed but if you have further questions on this or any other matter concerning Telefónica please do not hesitate to contact us through Community Consultation & EMF Enquiries within 14 days from the date of this letter.

Yours sincerely



Dianne Perry MRTPI AssocRICS

Consultant Planner: Clarke Telecom

Tel: +44 (0) 7535 932 374

Email: tweeddevelopmentplanning@gmail.com

(for and on behalf of Cornerstone and Telefonica UK Ltd)