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Our ref: CTIL\_242202\_VF\_15321

31 October 2019

The Chief Planning Officer  
Planning - Development Control  
Camden Council  
Camden Town Hall  
Judd Street  
London  
WC1H 8ND

**FAO: Jennifer Walsh**

Dear Madam/Sir

**PRE APPLICATION FOR THE INSTALLATION OF A TELECOMMUNICATIONS BASE STATION, COMPRISING THE INSTALLATION OF 9 NO ANTENNA, 5 NO DISHES, EQUIPMENT CABINETS AND ANCILLARY DEVELOPMENT THERETO AT CTIL\_242202\_VF\_15321 ALBION HOUSE, 55-59 NEW OXFORD STREET, LONDON, WC1A 1BS NGR E: 530052 N: 181421**

This pre-application enquiry is submitted on behalf of Cornerstone Telecommunications Infrastructure Ltd which is a joint venture company owned by Telefonica UK Limited and Vodafone Limited and which oversees the two companies plan to jointly operate and manage a single network grid across the UK.

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 proposal is for Vodafone.

Cornerstone and Vodafone are in the process of progressing a suitable site in the 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 Vodafone's technical network requirements. This approach accords with Vodafone's Best Practice Commitments to ensure consultation with Local Planning Authorities and other appropriate key stakeholders.

As part of Vodafone's continued network improvement program, there is a specific requirement for a replacement rooftop installation at Albion House, 55-59 New Oxford 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

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decommissioned and is now off air. There is currently no coverage for Vodafone 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 and Vodafone to provide replacement coverage for the existing site at Castlewood House. Please refer to the attached map which sets out the replacement sites in the context of the existing site.

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work. When a site is due to be decommissioned, the replacement site or sites must be located to fit in with the existing network in order to provide the replacement coverage.

This letter therefore invites the Local Planning Authority, in accordance with planning policy guidance and Best Practice Commitments, to enter into paid pre-application discussions with regard to our preferred site option prior to a formal planning submission.

**The proposed site:**

**CTIL\_242202\_VF\_15321 ALBION HOUSE, 55-59 NEW OXFORD STREET, LONDON, WC1A 1BS NGR E: 530052 N: 181421**

*The site is required to help fill the 2G, 3G and 4G coverage loss following the decommissioning of the existing site at Castlewood House (below).*



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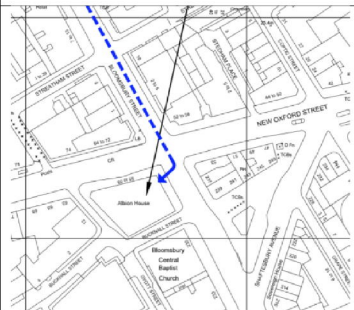

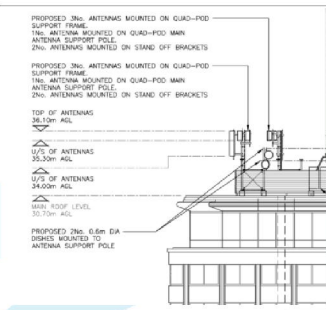


**The proposal:**

The proposals relate to the installation of 9 no. antennas, 2 no. transmission dishes, 1 no. equipment cabinet, 3 no. flat pack frames and ancillary development thereto.

**The preferred design:**

Our preferred design is to position the antenna on the plant roof level of Albion House (30.70m AGL). The plant room roof is set well back from the main roof ridge. Therefore, the antennas will be further shielded from external vantage points at ground level. The area is already established with rooftop antennas as Castlewood House nearby had the operator's equipment on it, up until recently. The proposed antennas will appear very similar to these. It is considered that given the scale of this building that the antenna will not be prominent in the street scene.

SITE LOCATION PLAN	SITE PHOTO	SITE SPECIFIC DRAWINGS
		

A number of alternative designs have been considered as set out below:

<b>Reduce antenna numbers</b>	Due to the technical requirement for the operator, the number of antennas cannot be reduced. 9 no antennas are needed here to provide 2G, 3G and 4G coverage for Vodafone, thus a reduction in antenna numbers is not possible.
<b>Pole Mounts on lower level</b>	Design engineers have confirmed that any antenna located on the lower levels of Albion House would need to be located close to the building edge in order to avoid clipping and be ICNIRP compliant. The site line diagrams which form part of this submittal demonstrate that the antenna will be visible in all views. Accordingly, equipment located on the lower levels of



	Albion House will be more prominent in the street scene than the current proposal.
<b>Face mounted antenna on plant room</b>	Face mounting antennas on the plant room was investigated. However, antennas could not be face mounted on the plantroom as this would not be ICNIRP compliant. People would not be able to walk in front of the antenna, and the edges of the building would clip the signal. The height and position of the antennas is the preferred design (see above) and the minimum height needed to ensure both coverage and ICNIRP compliance.
<b>Face mounted antenna on Albion House elevations</b>	Face mounting antennas on Albion House was investigated. However, antennas could not be face mounted on Albion House due to the location of the windows and adjacent buildings.  The height and position of the antennas in the current proposal is the minimum height needed to ensure both coverage and ICNIRP compliance.
<b>GRP Extension to Plant Room</b>	Locating antenna in a GRP plant room extension would require an increase in height of circa 2.5m. It is considered that a GRP solution would be highly visible and prominent in the street scene.

Please refer to the attached Design Justification, preferred design drawings and line of site drawings.

Alternative site options considered and rejected are as follows:

<b>Site</b>	<b>Site Name, Address, NGR, Site Type</b>	<b>Reason for not Choosing</b>
RT	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.
RT	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.

RT	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.
RT	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.
RT	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.
RT	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.
RT	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.

#### ICNIRP

All Vodafone 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 submittal pack.

#### Our request to you

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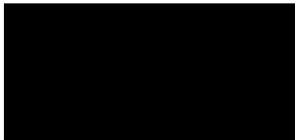
We look forward to meeting with you to discuss the above.

As a response to our pre-application enquiry we would like to receive:

- Appropriate planning constraints including any restricting permitted development rights
- Telecommunications history of the site or applications pending in the surrounding area
- Community interest groups and other stakeholders you consider may like to know more about our proposals
- Comments on the proposal, its acceptability and what can be done to make it acceptable. If location is acceptable but design not, then please state so in your response.
- Details of additional information such as photomontages to assist with the justification and assessment of the proposal at application stage

We look forward to receiving your acknowledgement and confirmation of a meeting date as soon as possible. It is noted this pre-application advice request is being dealt with in tandem, under the same fee, as the pre-application advice request the other Castlewood House replacement sites at 100 New Oxford Street (CTIL Ref: 237044) and Matilda Apartments / St Giles (CTIL Ref: 242201).

Yours faithfully



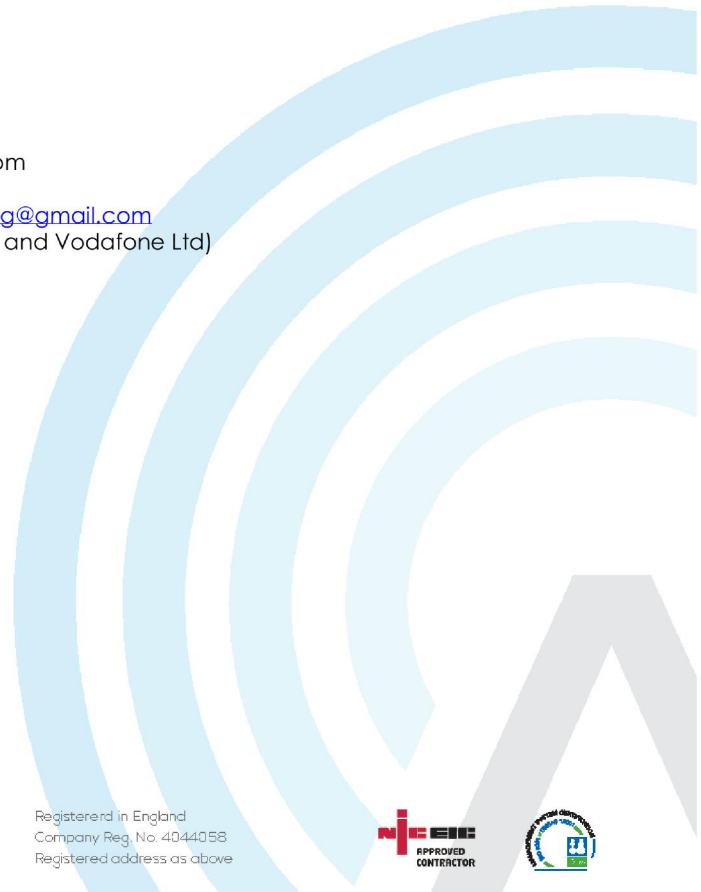
**Dianne Perry MRTPI AssocRICS**

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(for and on behalf of Cornerstone and Vodafone Ltd)



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