

Our ref: **5030320\_TEF\_72750\_VF\_88298**

Keir Starmer  
House of Commons  
London  
SW1A 0AA

Email: [keir.starmer.mp@parliament.uk](mailto:keir.starmer.mp@parliament.uk)

12 May 2020

Dear Keir Starmer MP,

**PROPOSED REPLACEMENT BASE STATION AT 15030320\_TEF\_72750\_VF\_88298, GRANGEMILL, 6-7 INGESTRE ROAD, CAMDEN, LONDON NW5 1XH (SITE REF 150303) NGR 528814 / 185803**

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 Telefonica UK Limited and Vodafone Limited.

This letter is sent to you in the pre-planning application consultation phase of the development for a replacement 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](mailto: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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The site is required to help fill the coverage loss following the decommissioning of the site at Linton House 39 – 51 Highgate Road, Kentish Town NW5 1RS to enable refurbishment and extension of the building. Replacement coverage is proposed to be provided at Grangemill in conjunction with the coverage currently provided by the temporary site at 379 Kentish Town Road, which is itself to be decommissioned by August 2020 following the loss of an enforcement appeal in 2019.



The operators have no security of tenure on the existing site, and the loss of service provision in this very busy part of the capital is imminent without a permanent replacement site. There is therefore an urgent need to provide permanent replacement coverage as soon as possible, as the operator's customers will soon be 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, 4G and 5G service provision is maintained and enhanced in and around the NW5 area of London. In line with both operator's joint agreement, this replacement site will ensure that both Vodafone and Telefónica can utilise this site.

**Our technical network requirement is as follows:**

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The proposal is for 12 no pole mounted antenna, 2 no 600mm dishes, 2 no 300mm dishes, together with the installation of equipment cabinets to be installed on a new steel support grillage at roof level and ancillary development thereto.

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

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Rooftop	The Piano Works, 28- 34 Fortess Road, London, NW5	529004/185390	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage.
Rooftop	Tally Ho Apartments, London, NW5 1AA	528965/185363	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage. This site has therefore been discounted for this reason.
Greenfield	19-37 Highgate Road, London, N22 6BH	531381/189775	Site provider has planned redevelopment. This site has therefore been discounted for this reason.
Rooftop	30-42 Highgate Road, London, NW5 1NS	531374/189834	The site was discounted by radio planners as the site will not provide adequate coverage to the target area. This site has therefore been discounted for this reason.

Rooftop	O2 Forum, 9-17 Highgate Road, London, NW5 1JY	528923/185318	This is a Listed Building therefore development on this heritage asset should be avoided and other locations are considered to be more appropriate. This site has therefore been discounted for this reason.
Rooftop	Highgate Bus Centre, 299 Archway Road, London, N6 5AA	528593/188125	The site was discounted by radio planners as the site will not provide adequate coverage to the target area. This site has therefore been discounted for this reason.
Rooftop	Dean House Studios, London, NW5 1LB	528795/185413	The site was discounted by radio planners as the site will not provide adequate coverage to the target area. This site has therefore been discounted for this reason.
Rooftop	Acland Burghley School, 93 Burghley Road, London, NW5 1UJ	529065/185919	This is a Listed Building therefore development on this heritage asset should be avoided and other locations are considered to be more appropriate. This site has therefore been discounted for this reason.
GF	J Murphy and Sons Limited, Highview House, Highgate Road, London NW5 1TN	528913/185316	The buildings are not suitable for hosting telecommunications. A ground-based mast would therefore be required which was considered not be the best planning solution in the area as in line with NPPF says existing structures and rooftops should be utilised where possible.
Roof Top	Christ Apostolic Church, 23 Highgate Road, London NW5 1JY	528921/185304	This is a Listed Building therefore development on this heritage asset should be avoided and other locations are considered to be more appropriate. This site has therefore been discounted for this reason..
Rooftop	Kentish Town Fire Station, 20 Highgate Road, London, NW5 1NT	528899/185441	The only feasible design available to the operators is considered to have more of a visible impact than the proposed site.

In line with Best Practice principles we have shared these details with planning officers and the Ward councillors.

ICNIRP Compliance.

All Telefónica and 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 submission.

### Radio technology and health

Useful information sources on this include:

Code of Best Practice on Mobile Network Development

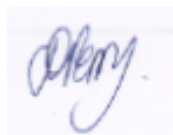
<http://www.mobileuk.org/cms-assets/documents/259876-147086.code-of-best-practice-2016-edition-pub>

National Planning Policy Framework [www.communities.gov.uk](http://www.communities.gov.uk)  
World Health Organisation – Electromagnetic Fields [www.who.int/peh-emf/en](http://www.who.int/peh-emf/en)

International Commission on Non-Ionising Radiation Protection [www.icnirp.de](http://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 or Vodafone 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**  
**Consultant Town Planner**  
**NET Coverage Solutions Ltd**

Mobile: 07535 932374

Email: [tweeddevelopmentplanning@gmail.com](mailto:tweeddevelopmentplanning@gmail.com)

(for and on behalf of Cornerstone, Telefónica UK Ltd and Vodafone Ltd)