

Our ref: CTIL_237044_TF_81555

The Chief Planning Officer
Camden Borough Council
Development Management
Camden Town Hall Extension
Argyle Street
London
WC1H 8EQ

Email: planning@camden.gov.uk

VIA EMAIL

15 October 2020

Dear Chief Planning Officer

PROPOSED RADIO BASE STATION INSTALLATION AT CTIL_237044_TF_81555 100 NEW OXFORD STREET, LONDON, WC1A 1HB NGR E: 529960 N: 381445

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 Telefónica UK 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

Cornerstone and Telefónica and 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 Telefónica's technical network requirements. This approach accords with Telefónica's Best Practice Commitments to ensure consultation with Local Planning Authorities and other appropriate key stakeholders.

As part of Telefónica's continued network improvement program, there is a specific requirement for a replacement rooftop installation at 100 New Oxford Street to replace the radio base station which was lost on the opposite of the road at Castlewood. The site provider at Castlewood 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 capitol. 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. In line with both operators joint agreement, this replacement site will ensure that Vodafone as well as Telefónica will be able to utilise this site and reinstate their coverage in the area as well.

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.

This letter therefore invites the Local Planning Authority, in accordance with planning policy guidance and Best Practice Commitments, to enter into pre-application discussions with regard to our preferred site option prior to a formal planning submission. Several steps in the site identification process have already been undertaken. The Local Planning Authority must register and our records of other potential sites have been reviewed, the policies in the Development Plan have been taken into account and we have examined the inter-operator site sharing database.

Our technical network requirement is as follows:

CTIL_237044_TF_81555 100 NEW OXFORD STREET

The site is needed to reinstate and enhance 2G, 3G and 4G coverage and capacity for Telefónica to ensure that its customers experience and maintain access to the latest service provision currently available. The installation will also meet the extra demands on the network in this area as more people use internet enabled handheld devices. Vodafone customers will also be able to benefit from significantly improved service provision under the operators joint agreement with Telefónica to utilise their network infrastructure.

The preferred Telefónica option is as follows:

100 NEW OXFORD STREET, LONDON, WC1A 1HB NGR E: 529960 N: 381445

The proposals relate to the installation of 6 no. antennas, 2 no. transmission dishes, 1 no. equipment cabinet, 3 no. flat pack frames and ancillary development thereto including 15 no. Remote Radio Heads (RRHs).

The operators have chosen this building as it 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.

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 28m and the top height of the antennas is 31.6m. 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 100 New Oxford Street will also ensure that the antennas will not be overly visible from ground level.

The proposed rooftop antennas will be located to the east and west ends of 100 New Oxford Street, as well as to the rear. They will be grouped in pairs utilising 3 free standing frames. This will avoid clipping issues from the rooftop of the host building.

The transmission dishes will be located on the south east corner and rear of the rooftop. Transmission dishes require a clear line of sight to link up to the network. Otherwise the antennas would not be able

to transmit their signal. Given their siting and distance above ground level they will not appear obvious in the streetscene.

The equipment cabinets are located centrally on the rooftop and therefore will not be visible from any external vantage points.

The RRHs are very small for telecommunications equipment approximately the size of a show box. They will be located behind the proposed antennas. Given their position set back from the roof edge over 28m above ground level they will not be visible once in situ.

Alternative site options considered and rejected 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.

We look forward to receiving your comments on the preferred option identified above and alternatives discounted. We would also like to take this opportunity to extend an invitation to meet with you to discuss the proposal and undertake a tour of the options considered, should you consider this to be beneficial.

The Local Planning Authority must register and our records of other potential sites have already been reviewed, the policies in the Development Plan have been taken into account and the planning history of the site has been examined.

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

We would be grateful if you could advise us of any pending telecommunications applications or recent planning decisions in this particular area so these can be evaluated.

Finally, we would be interested in any local stakeholders or groups that you consider would like to know more about our proposals. For your information we will be similarly consulting the local ward councillors for Bloomsbury: Cllrs R Madlani, A Harrison and S Francis, the local MP Keir Starmer and the local London AM Andrew Dismore.

We enclose a copy of our Consultation Plan and welcome your suggestions.

We look forward to receiving your response within 14 days of the date of this letter.

Yours faithfully

A handwritten signature in blue ink, appearing to read "J. Hann".

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(For and on behalf of Cornerstone and Telefónica Ltd)