

Our ref: CTIL_237044_TF_81555

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

Email: keir.starmer.mp@parliament.uk

VIA EMAIL

15 October 2020

Dear Mr Starmer

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 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

Cornerstone and Telefónica are in the process of progressing a suitable site in the New Oxford Street area for a replacement radio base station. 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.

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 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) at **100 NEW OXFORD STREET, LONDON, WC1A 1HB NGR E: 529960 N: 381445**. 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.

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.

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 Bloomsbury Ward councillors and the local London AM Andrew Dismore.

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 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

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

Jennie Hann BSc MTPL MRTPI

Planning Manager

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(For and on behalf of Cornerstone and Telefónica UK Limited)