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Our ref: CTIL_242202_VF_15321

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

2 July 2019

Dear Chief Planning Officer

**PROPOSED RADIO BASE STATION INSTALLATION AT CTIL_242202_VF_15321 ALBION HOUSE,
55-59 NEW OXFORD STREET, LONDON, WC1A 1BS NGR E: 530052 N: 181421**

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 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.

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:



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CTIL_242202_VF_15321 ALBION HOUSE, 55-59 NEW OXFORD STREET

The site is needed to reinstate and enhance 2G, 3G and 4G coverage and capacity for Vodafone 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.

The preferred Vodafone option is as follows:

ALBION HOUSE, 55-59 NEW OXFORD STREET, LONDON, WC1A 1BS NGR E: 530052 N: 181421

The proposals relate to the installation of 9 no. antennas, 5 no. transmission dishes, 2 no. equipment cabinet and ancillary development thereto including 21 no. Remote Radio Units (RRUs) and 1 no. GPS module.

The operators have chosen this building as it is as near as possible to 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 30.7m 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. Indeed, the antennas are to be located on the plant room roof which is set well in 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. The building mass of Albion House, 55-59 New Oxford Street will also ensure that the antennas will not be overly visible from ground level.

The proposed rooftop antennas will be located on the plant room roof of Albion House, on the north and east corners and the south west elevation. They will be arranged in to groups of 3 quad pod support frames. This will avoid clipping issues from the rooftop of the host building, as well as preventing the rooftop from being sterilised by ICIRP issues.

The transmission dishes will be located on the north and east corners of the plant room roof. They will be 0.6m in diameter. 3 transmission dishes are proposed on the north corner and 2 are proposed on the east corner of the plant room roof. 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 on the roof top of the plant room set in from its edge. Given their maximum height is 1.770m the building mass of the host property will ensure that they will not be seen from any external vantage points.

The RRUs are very small for telecommunications equipment approximately the size of a shoe box. They will be located behind the proposed antennas in each of the three locations on the plant room roof. Given their position set back from the roof edge over 30m above ground level they will not be visible once in situ.



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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 – 64-76 New Oxford Street, London, WC1A 1BS NGR E: 530025 N: 181455**
A site in this location would not 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 Vodafone. It has therefore been discounted for this reason.
- **Rooftop – Prospect House, 92-112 New Oxford Street, London, WC1A 1HH NGR E: 529938 N: 181429**
This property would not provide as good coverage to the operator compared to the preferred option due to its height and location. It has therefore been discounted as it would not provide the necessary coverage to the target coverage area.

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 mast 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 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



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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 Holburn and Covent Garden: Cllrs J Fulbrook, S Vincent and A Olad, 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



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(For and on behalf of Comerstone and Vodafone Limited)