

Our Ref: 17120/MS/TH/SiK  
Your Ref: PP-07647431  
Email: [thumphries@firstplan.co.uk](mailto:thumphries@firstplan.co.uk)  
Date: 25 February 2019

Planning Department  
Camden Council  
5 Pancras Square  
Kings Cross  
London  
N1C 4AG

Dear Sirs,

**PLANNING APPLICATION FOR THE INSTALLATION OF 14 POLES, EACH SUPPORTING 5 ANTENNAS, ON THE ROOFTOP OF THE BUILDING  
BABINGTON COURT, ORDE HALL STREET, LONDON WC1N 3JT**

We are instructed by our client, Optimity Ltd, to submit an application for planning consent to install 14 no. poles, each supporting 5 antennas, to the rooftop of the above building. This application has been submitted online via the Planning Portal (ref: PP-07647431). It is supported by the following documentation:

- Completed application forms (including certificate B)
- Completed CIL liability forms
- Document pack including:
  - Site Location Plan
  - Block Plan
  - Existing and proposed roof plans
  - Existing and proposed elevations
  - Existing and proposed cross-sections
  - Antenna detail
- Appendix A – Schedule of owners / leaseholders notified under Article 13 of the Town and Country Planning (Development Management Procedure) (England) Order 2015
- Radiation safety certificate

Optimity Ltd is a dynamic technology service provider based in London. Since starting out in 2002 they have sought to actively engage with customers to help provide unique holistic approaches to improve connectivity, telecoms, mobile, security and IT, ensuring that their clients receive technology tailor-made to their business.

One such scheme involves the development of a network consisting of both fibre-optic and advanced wireless technology that is designed to provide a low cost high-performance, resilient internet connection to London. As part of this network private point-to-point receivers link across London's rooftops and, as a result, can deliver a seamless service of 10Mb-1Gb connections to businesses with a service level that operates all day, every day, throughout the year.

This application is for the installation of 14 poles, each supporting 5 antennas, to the roof of the application building to facilitate this service. The antennas provide ultra-fast internet connectivity, with performance

identical to that provided by leased line fibre optic alternatives. The service is both ultra-low latency (making it suitable for business-quality telephone calls) and symmetrical (making it as fast to send data as it is to receive it). The service is not interrupted by weather conditions and enables a business to be connected to a high-quality internet service in days rather than months (as is the case with fibre optic). The service is used by small and medium-size businesses that either cannot afford the cost of the fibre optic alternative or need a back-up alternative to a wired connection.

The London Borough of Camden adopted their Local Plan in July 2017. Although there is no specific telecommunications policy, it is evident from Policy E1 'Economic Development' and its supporting text that the Council recognise the importance of digital infrastructure for business. Policy 4.11 of the London Plan goes on to encourage a Connected Economy, ensuring an adequate and suitable network connectivity across London to help facilitate the provision and delivery of ICT infrastructure.

At a national level, Section 10 of the National Planning Policy Framework (NPPF, 2019) is predicated on supporting a high-quality communications network. Paragraph 112 requires planning policies and decisions to support the expansion of electronic communications networks, which in turn will support economic growth and social well-being. Paragraph 113 goes on to encourage the use of existing buildings for new electronic communications.

The antennas will be of a modest size, will not have an impact on views from the public realm or near-by conservation area as a result of their location on the rooftop of the building, and will have no impact on the amenity of the area or surrounding residential occupiers. Indeed, the radio signal occupies the 80GHz spectrum and is low-power, posing no risk to health even when in immediate proximity to the equipment. This is confirmed by the radiation safety certificate provided as part of this application. With this in mind, it is considered that the application proposals are entirely acceptable in all respects.

In this context, it is relevant to note that Part 16, Schedule 2 Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 allows for the installation of up to 5 antenna systems on this kind of building under permitted development rights (at paragraph 2). As this application proposes the installation of 14 poles, each with 5 antennas, it falls outside of what is allowed under permitted development rights and, therefore, requires planning consent. However, the fact that this kind of development is allowed under permitted development underlines the fact that it should be considered acceptable in planning terms.

As such, we respectfully request that the application is approved.

I therefore trust that you have sufficient information in order to approve this application, however, should you have any queries then do not hesitate to contact me. Otherwise, I look forward to discussing the application with you in due course.

Yours Faithfully,

TIM HUMPHRIES  
Planner

## **Appendix A: Schedule of Owners / leaseholders notified under Article 13 of the Town and Country Planning (Development Management Procedure) (England) Order 2015**

The applicant certifies that they have given the requisite notice to everyone else (as listed below) who, on the day 21 days before the date of this application, was the owner (owner is a person with a freehold interest or leasehold interest with at least 7 years left to run) and/or agricultural tenant ("agricultural tenant" has the meaning given in section 65(8) of the Town and Country Planning Act 1990) of any part of the land or building to which this application relates.

- The Mayor and Burgesses of the London Borough of Camden, Town Hall, Judd Street, London WC1H 9LP
- Mohammed Chand-Miah, Akhtar Miah and Alfatun Nessa, Flat 2 Babington Court, Orde Hall Street, London WC1N 3JT
- Paul Mingides, 87 Princes Avenue, London N13 6HA
- Rishi Paresh Pabari and Eilla Rishi Pabari, 51 Longland Drive, London N20 8HH
- Peter Benjamin Howarth and Elizabeth Mairi Ellen Howarth, Flat 7, Babington Court, Orde Hall Street, London WC1N 3JT
- Kiros Kidane and Astier Kidane, Flat 8, Babington Court, Orde Hall Street, London WC1N 3JT
- Jolika Bibi and Sufian Miah, Flat 9, Babington Court, Orde Hall Street, London WC1N 3JT
- Peter Edward Goodwin, Flat 10, Babington Court, Orde Hall Street, London WC1N 3JT
- Jean Ivy Leech and Albert Edward Leech, Flat 14, Babington Court, Orde Hall Street, London WC1N 3JT
- Parbash Chandra Paul and Rajkumari Paul, Flat 23, Babington Court, Orde Hall Street, London WC1N 3JT
- Joseph Guselli, Flat 28, Babington Court, Orde Hall Street, London WC1N 3JT
- Mary Henritta Kaldor, Flat 29, Babington Court, Orde Hall Street, London WC1N 3JT
- Mintewab Ababe Awraris, N/S Lafto, K.03, H.No.354, PO Box 8750, Addis Ababa, Ethiopia
- Ruixian Ou and Yuwen Ou, Flat 31, Babington Court, Orde Hall Street, London WC1N 3JT
- David Secundo Cedeno Alvarex and Esther Yolanda Cedeno Figeroa, Flat 38, Babington Court, Orde Hall Street, London WC1N 3JT
- Emmanuel Olaoke and Hannah Olaoke, Flat 53, Babington Court, Orde Hall Street, London WC1N 3JT