

Planning Statement

Upgrade of existing telecommunications site

**Muswell Hill Telephone Exchange, Grand Avenue, London,
N10 3AY**

On behalf of Vodafone Ltd

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Author: SD



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1. Introduction

- 1.1. This statement is submitted in support of an application for full planning permission to upgrade an existing mobile base station. The Proposed Development will replace existing antennas with new antennas to be operated by Vodafone, allowing enhanced 4G and new 5G service provision from the site. The replacement antennas will be fixed in the same location as the existing antenna to be removed. The application site is operated by Cellnex UK, a radio site infrastructure provider.
- 1.2. The application includes:
 - A description of the site and surrounding area, including a description of the Muswell Hill Conservation Area within which the site is located.
 - A description of the proposal and the intended effect of the proposed antenna.
 - A statement of community engagement.
 - A review of planning policy.
 - A review of design and access considerations.
- 1.3. A number of accompanying documents have been submitted in support of the application, and these are referred to and should be read in conjunction with this Planning Statement.

2. The Site and Surrounding Area

- 2.1. The telephone exchange building is located on Grand Avenue and is within the Muswell Hill Conservation Area. The 1930s two-storey brick building has a utilitarian appearance which reflects its function. It is set back from the street line by a grassed verge and faces a number of streetside trees along the avenue. The immediate setting of the Exchange building is residential in character, being predominantly made up of large, terraced properties. The Muswell Hill District Town Centre comprising commercial development and uses is located a short distance to the north east. The site is also within close proximity to bus routes that serve the wider North London area, as well as the East Finchley and Highgate Underground Stations.
- 2.2. The Vodafone equipment, subject of this replacement application, is housed on the rooftop of a large telephone exchange building that benefits from being setback from the main building frontage.
- 2.3. The site is situated within an area with a high demand for mobile network services. It is considered that, given the sensitivity of the area, the least visually intrusive solution has been put forward via the upgrading of an existing site hosted within the commercial setting of a large telephone exchange rooftop rather than the introduction of an entirely new base station within the Conservation Area. It is important to note that in addition to being the sequentially preferable solution, the upgrading of an existing rooftop site will fit in within the existing network configuration, thereby eliminating the need to introduce additional base stations within the cell search area.
- 2.4. There are no landscape or ecology constraints which affect the site.

Muswell Hill Conservation Area

- 2.5. The Applicant has reviewed the Muswell Hill Conservation Area Audit (Supplementary Planning Guidance) in preparing this application. While the site is located within the conservation area, there is very little mention of the Telephone Exchange building in the Conservation Area Audit. The conservation area is an Edwardian suburb which centres around a village settlement, which has since developed as London has grown.
- 2.6. It should be noted that, owing to an extensive planning history detailed in this section, the presence of telecommunications apparatus on the rooftop of the Muswell Hill Telephone Exchange is well established.

Planning History

- 2.7. Consistent with the existing use of the rooftop area as a base station telecommunications installation, there is an extensive planning history relating to the fixing of associated equipment atop the telephone exchange roof, demonstrating the operators continued commitment to upgrading the site as part of the planned expansion of radio networks to deliver digital connectivity. This includes:
- HGY/2025/1409 – The installation of 1 no. new rooftop quadpod mast and upgrades to the existing tripod mast to accommodate antenna and ancillary radio equipment and ancillary development thereto – Approved 22/07/2025.

- HGY/2023/1985 – Installation of new and alteration of existing telecommunications apparatus on roof of building – Approved 15/09/2023.
- HGY/2022/3221 – Addition of 3no. antennas on new climbable tripods and installation of ancillary apparatus – Approved 13/12/2022.
- HGY/2021/0893 – Removal of 3 no. antennas and installation of 3 no. antennas and supporting steelwork and associated apparatus and ancillary works – Approved 07/05/2021.
- HGY/2019/1493 – Prior notification: Development by telecoms operators for: installation 1No. CSC Cabinet to be placed on an existing concrete plinth. In addition, the installation of 12No. ERS units will be mounted on proposed free standing frames, 3 No. antennas to be installed on existing steel work at a height of 14.9m & 13.7m to replace 3No. antennas be removed from a height of 14.9m & 13.7m. Additional ancillary works including cabling and cable trays. – Approved 24/06/2019.
- HGY/2016/2519 – Prior notification for the installation of replacement antennas, the removal of one equipment cabinet, the installation of two equipment cabinets and ancillary development – Approved 15/09/2016.

Overall, the planning history demonstrates a consistent pattern of development and adaptation of the rooftop area of Muswell Hill Telephone Exchange to provide telecommunications coverage.

3. The Proposal

- 3.1. The development proposed is shown in detail on the submitted drawings and comprises the upgrade of an existing electronic communications base station through the replacement of existing equipment with new equipment. The replacement equipment will continue to support the operator's network requirements while accommodating the latest technologies to deliver enhanced mobile connectivity.
- 3.2. Unlike earlier generations of mobile connectivity, the latest technologies have more significant technical and operational requirements and this has implications on the amount, height, position and design of the equipment proposed. The intended function of the equipment proposed is to provide enhanced 4G and new 5G coverage for the cell area within which the site is situated.
- 3.3. The description of the proposed works is as follows:
- "Removal of 6no. antenna and ancillary development to be replaced with installation of 6no. antennas at various heights together with installation of Remote Radio Units and ancillary development thereto."*
- 3.4. The design of the replacement equipment differs very slightly from the existing equipment. The new antennas will be affixed to the existing telecoms infrastructure. New steel supporting brackets are required upon which the replacement antenna will be fixed. These will allow for a modest increase in the height of the antennas to a maximum of 17.1m. which is lower than the maximum height of existing telecommunications equipment which sits at 18.5. The new antennas will allow for greater connectivity in the dense urban environment and allow the scheme to be ICNIRP compliant, as confirmed by the accompanying ICNIRP certificate. Any required upgrade to radio equipment housing will take place within existing radio equipment cabinets and does not form a part of this planning application because it does not require planning permission.
- 3.5. Paragraphs 16 & 17 of the Code of Practice for Wireless Network Development in England, published in March 2022, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements and the anticipated use of existing sites, including those owned by site infrastructure providers like Cellnex UK.
- 3.6. The application site has been selected by the operator as this will provide the required level of network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communications antennas and sites, in this case owned / operated by Cellnex UK.

Ecology

- 3.7. The site relates to an existing telecommunications base station on the rooftop area of an existing building. It does not feature any priority habitat and there is no on-site habitat that might be affected. The proposal is therefore except from the requirement to provide Biodiversity Net Gain.

Heritage

- 3.8. The proposal is situated within a conservation area, a designated heritage asset for the purposes of applying the National Planning Policy Framework. The NPPF requires an assessment of the degree of harm will cause to designated heritage assets where a public benefits balancing exercise is triggered where less than substantial harm is identified. In this instance, given the site is already characterised by a telecommunications installation and the site is set at height, back from the parapet edge of the building, the applicant takes the view that a negligible degree of harm will result to the conservation area as a result of the proposals.

4. Prior Engagement

- 4.1. The National Planning Policy Framework (NPPF) and the Code of Practice for Wireless Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received amber when assessed against the traffic light rating model as referenced in the Code of Practice.
- 4.2. In addition to a consultation letter sent to the Local Planning Authority, consultation letters have been sent to Ward Councillors Brennan and Connor.
- 4.3. In our engagement letter we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community and obtain your comments on the siting and design of the development.
- 4.4. Regrettably we have not received any response from your authority or any other consultee and accordingly we would be pleased to address any necessary matters within the determination period of the application.

5. Planning Policy

5.1. The relevant planning policy and best practice framework is found principally within:

- National Policy, especially the National Planning Policy Framework (NPPF)
- The local policy framework set out in the adopted Development Plan;
- The Code of Practice for Wireless Network Development in England.

5.2. From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3. There is significant UK Government support for the delivery of upgraded coverage, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. To deliver improvements to existing services and supporting future mobile technologies, it is essential that the planning system looks to support and facilitate new base station installations such as that proposed to meet the Government's Digital Strategy. This support is reflected in Section 10 of the National Planning Policy Framework which says that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. In addition, modern connectivity, will be essential to help the Government meet its wider sustainability and climate change targets.

Balancing operational and environmental considerations

5.4. The special operational and technical factors that require specific siting of a base station should be balanced by the need to minimise environmental and visual impact.

5.5. However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the NPPF now applies a reduced policy test compared to previous guidance. This helps to clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

5.6. In balancing these requirements, the starting point for the networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies such as Cellnex UK. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.

- 5.7. Although replacement antennas are required in this instance, this will be at an existing site owned or managed by Cellnex UK, where there are existing operations which is suitable for electronic communications use by virtue of the existing structure. Replacement antennas are required in this instance, as the existing antennas are already developed to full capacity due to the amount of existing equipment already installed (amend accordingly). The development entails the use of an existing site owned or managed by Cellnex UK which is in operational use and where antennas are already an established feature of the site and the wider urban environment. Within this context the replacement antennas will be seen as an acceptable and justified use, reflecting all of the considerations within NPPF Section 10 and:
- The base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area;
 - The target coverage area has been explained and consequently the special operational and technical requirements necessitate siting of antennas within it;
 - All reasonable steps have been taken, through careful siting at an existing Cellnex UK communications site, to moderate the visual impact of the development, having regard to technical and operational factors. In this case, the replacement existing antennas now an established and accepted feature within the landscape; and
 - The proposal to share this existing communication site, through the installation of a replacement looks to strike the optimum solution, particularly when compared with the alternative of erecting a new base station elsewhere and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site.
- 5.8. The replacement antennas require planning permission given the site location within a conservation area. Nevertheless, the principle, the development proposed is in accordance with the relevant policy framework and should therefore be acceptable. In the next section, the Design Considerations are reviewed to demonstrate that the detail of the development is also acceptable and that in accordance with the presumption in favour, planning permission should be granted.
- 5.9. Section 16 of the NPPF relates to heritage where paragraph 207 states that local planning authorities should require an applicant to describe the significance of any heritage asset affected. Although situated within a conservation area, this designated heritage asset will not be affected by the proposals since the works amount to a modest upgrade to an existing established telecommunications installation that will result in a negligible degree of change to the conservation area and no harm in heritage terms. It is therefore not relevant to consider paragraph 215 of the NPPF which requires a balancing exercise of the public benefits of the proposal against harm because there would be no harm associated with the scheme.

Local Policy Considerations

- 5.10. At the local level, the proposal should be assessed against relevant policies from the Local Development Management DPD (2017), Haringey's Local Plan: Strategic Policies 2013–2026 (2013) and the London Plan (2021).

The London Plan

- 5.11. The London Plan 2021 is the new Spatial Development Strategy for Greater London and was adopted in March 2021 and is now part of the statutory development plan. It sets out a framework for how London will develop over the next 20–25 years and the Mayor's vision for Good Growth. Chapter 1 of the London Plan deals with 'Planning London's Future – Good Growth'. Para.1.O.1 relates to 'Good Growth' that is "socially and economically inclusive and environmentally sustainable and underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved".
- 5.12. GG5 'Growing a good economy' states: *"To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must: '... D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth E ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning' '... H recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success."*
- 5.13. The proposed amendments to the base station installation is critical infrastructure which will provide world class digital connectivity which will support the digital economy. Reliable mobile digital connectivity supports London's growth, and contributes to the low carbon economy by enabling flexible working amongst other things. In terms of supporting London's role in innovation toward growing a good economy.
- 5.14. Policy SI 6 relates to 'Digital Connectivity Infrastructure'. Para 9.6.1 states that 'the provision of digital infrastructure is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration'(emphasis added).
- 5.15. Paragraph 9.6.6 states 'Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified. Where possible, other opportunities to secure mobile connectivity improvements should also be sought through new developments, including for example the creative use of the public realm'.
- 5.16. Policy HC1 states that proposals that may potentially affect heritage assets should conserve and protect their significance where possible, including the setting, character and appearance. Any cumulative impacts on the heritage asset should be appropriately managed.

Local Development Management DPD (2017)

- 5.17. Local Development Management DPD (2017) was adopted by full council on 24 July 2017 and is the key document used in determining planning applications in the London Borough of Haringey.
- 5.18. Policy DM3(d) relates to telecommunications equipment, whereby proposals for the installation of equipment should be designed so that it is minimal while meeting the operational requirements. Likewise, there would be no adverse impact on the visual amenity of the area or amenity of the surrounding occupiers.
- 5.19. Policy DM54 states that the Council will promote the development of advanced and high-quality communications infrastructure to support growth and inclusive communities. Proposals should accord with Policy DM3.
- 5.20. Policy DM9 notes the importance of maintaining historic assets within the Borough. The design of the development should be sensitive to the related conservation area and its significance, character and appearance.

Haringey's Local Plan: Strategic Policies (2013)

- 5.21. The Strategic Policies Plan should be read in tandem with the DPD and was adopted by the Council in 2013.
- 5.22. Policy SP12 relates to conservation, by which proposals should be considered for the important heritage assets that surround the site area. Development should be appropriately sited and designed to ensure historic significance can be maintained.
- 5.23. It should be noted that the proposal accords with the above policies by:
- The application proposes the replacement of an existing site rather than the installation of a new site. This means that the existing context for the site is characterised by existing telecommunications equipment. Moreover, the design of the proposal has been centred away from any key views and will not be visible to those in and around the telecommunications exchange.
 - The visual impacts of the proposal are minimised accordingly. Likewise, the character and appearance of the conservation area will essentially remain unchanged. This accords with the adopted local policy.
 - The application site is an existing telecommunications site and has nil ecological value.
 - The proposal will not introduce anything new, as telecommunications equipment has been established on this site for a number of years, as evidenced by the planning history. It therefore does not create a new situation that would result in undue harm to the Muswell Hill Conservation Area and therefore, it accords with Policy HC1 from the London Plan, Policy DM9 and Policy SP12 from the adopted local plan.
 - The proposal is concerned with the provision of wireless networks and is the sort of development Policy DM3(d) as well as Policy DM54, expressly relates to. Furthermore,

an ICNIRP certificate accompanies this application, demonstrating that the installation is in conformity with the latest national guidelines on radiation protection.

- As telecommunications equipment is already present on the site with no identified conflicts with national operating requirements, the proposed replacement equipment is likewise not expected to result in any adverse impacts.

6. Design Considerations

- 6.1. To assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors addressed from Paragraph 20 of the Code of Practice.

Amount, Design, Layout and Scale of the Development

- 6.2. The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide 5G coverage to the local area, having regard to the need to minimise visual impact, already referred to above. The telecommunications equipment will not be visible from the public realm and is acceptable in terms of its siting, size and appearance, given the pre-existing telecoms equipment on this building and that the host building is an established telephone exchange. Accordingly, the equipment will preserve and enhance the character and appearance of the Muswell Hill Conservation Area.

- 6.3. With regard to the main component elements of the development proposed:

Antenna design/or mode of building install

- 6.4. The design of the proposed antennas is essentially the same as the existing antennas, albeit 1m shorter in height. They comprise a slim rectangular piece of hardened plastic that is fixed to steel supporting structures atop the roof. The steel bracket fixings required for the proposed development are marginally larger than those currently installed because they need to be stronger to accommodate heavier equipment, meaning the replacement antennas will be at a different height than the existing antennas. Still, owing to their position on the roof, the replacement antennas will not be visible to those on Grand Avenue. Likewise, views of the building to the rear are very limited, where the existing cannot be seen, and thus the proposed equipment will also be hidden.

Antenna Array

- 6.5. The number of antennas and their size have been kept to the minimum necessary to provide coverage and to link this site back into the operator's network. The design of these features is very much driven by operational and technical factors. There will be no material increase in the number of antennas on site.

Access Considerations

- 6.6. Access to the site will be provided from the existing access point. There is no public access to the roof.
- 6.7. Once constructed, the development will be unmanned, requiring only periodic visits, typically once every three months (approx.) for routine maintenance and servicing.
- 6.8. In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by

members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Townscape

- 6.9. The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with antennas, which are the most visible component, and which cannot be fully screened for operational reasons. Nevertheless, specific siting has been progressed such that the antennas would be seen in the context of the existing rooftop equipment, where the presence of telecommunications equipment has been established without issue.

Appearance

- 6.10. The sensitive approach to siting and design minimises the appearance of the development proposed. In addition, as indicated above the local topography and natural features should help minimise views. To that extent, they should be viewed as accepted features of the local environment as with other forms of communications networks and essentially public utility infrastructure, such as roads and railways.

7. Health and Safety

- 7.1. In support of the application, a certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.
- 7.2. The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.
- 7.3. National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

8. Summary and Conclusions

- 8.1. In summary, the application relates to an existing electronic communications base station and is necessary to improve a vital network operated by Vodafone Ltd that provides public services in the form of digital connectivity. The proposal will replace 6no. existing antennas to a maximum height of 17.1m across the rooftop of the Muswell Hill Telephone Exchange. This will also allow for the removal of existing antennas as well as the replacement of other related telecoms equipment. The proposal will allow for 5G service coverage provision from the site.
- 8.2. The proposed development will result in 5G service provision from the site in a site sharing arrangement for EE and Hutchinson 3G Ltd. The service provided by the operator is in the public interest and is in very high demand, In the UK there are now more than 92.5 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 8.3. The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.
- 8.4. The operator's requirement is in the context of network needs associated with an upgraded cellular system. These impose particular locational and siting requirements, which are even greater with upgraded coverage. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.
- 8.5. The operator has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:
- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex UK.
 - Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio antennas and sites for them.
 - Engagement in accordance with the Code of Practice procedures.
 - An examination of design options to try and minimise potential visual impact.
 - The replacement of existing radio antennas, compared with the alternative of erecting new antennas and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site.
- 8.6. The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.
- 8.7. This statement and the other accompanying material has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in particular within the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

- 8.8. In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting approval applies.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Bristol

First Floor, South Wing, Equinox North,
Great Park Road, Almondsbury, Bristol, BS32 4QL
T 01454 625945
E Bristol@pegasusgroup.co.uk
Offices throughout the UK.

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