WHP Telecoms Ltd
a WHP Group Company

WHP Telecoms Ltd
401 Faraday Street
Birchwood Park
Warrington, WA3 6GA

Tel: 01925 424100
Email: info@whptelecoms.com
www.whptelecoms.com

Chief Planning Officer
Haringey Council London Borough
Planning, Regeneration & Economy
Level 6
River Park House
225 High Road
Wood Green
N22 8HQ

Email: development.control@haringey.gov.uk

14th September 2026

Our Ref: KGX920LE1/Wood Green Tunnel (London End)
Your Ref: [if applicable]

Dear Sir/Madam,

FRESHWAVE/PROJECT REACH

APPLICATION FOR PRIOR APPROVAL

PROPOSED BASE STATION: TRACKSIDE 90 METRES SOUTHEAST OF WOOD GREEN TUNNEL (LONDON END), N22 7RY, NGR E529747 N191034 COMPRISING 1NO. 6M POLE SUPPORTING 2 NO. SHROUDED YAGI ANTENNAS, 1NO. EQUIPMENT CABINET, ANCILLARY DEVELOPMENT

The application is submitted in accordance with the requirements of Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, and seeks a determination as to whether the Authority's approval will be required for the siting and appearance of the development.

The application comprises:

- An O.S. site plan scale 1:50000 showing the location where the apparatus will be installed
- Electronic payment of £759 in respect of the application fee (£610 plus £149 Planning Portal service charge)
- The Developer's Notice served on the landowner
- The Developer's contact details
- A certificate of ICNIRP compliance

The following information is also provided to assist with your determination of the application:

- The Authority's 1APP form for telecommunications development prior approval applications
- Drawing reference numbers 100, 200, 201, 300, 301, 302 and 303 providing further details of the siting, layout and design of the development

This letter and the enclosures also provide due notification, as may be required, under the relevant conditions of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. In particular, the Local Planning Authority is given notice of the intention to install the electronic communications apparatus described in more detail in the application documentation (including the scale drawings) and to be located as shown on the application plans.

Developer's Contact Details

All correspondence and queries relating the determination of this application should be submitted to the undersigned.

However, in accordance with the requirements of The Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, any correspondence to the developers should be sent to:

Freshwave/Project Reach
Level 1, 50 Cowcross Street, London, EC1M 6AL
Email address: robert.pugh@freshwavegroup.com

The permitted development rights granted by Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended (the GPDO), exist to facilitate the establishment of modern communications apparatus and infrastructure judged by successive governments to be important to a modern economy and in attaining sustainability objectives.

The permitted development granted subject to the prior approval procedure is similar to the grant of outline planning permission, with details of precise siting and appearance being reserved. This is explained at Annex A Glossary of Code of Practice for Wireless Network Development in England, March 2022. The National Planning Policy Framework is also accordingly clear that permitted development rights should not generally be withdrawn.

As a consequence, the scope of determination does not extend to whether the site selected is needed, as the development is acceptable in principle due to the rights conveyed by the GPDO.

As the principle of development at the application site is permitted by the GPDO, this support letter focuses on the statutory criteria of detailed siting and appearance. In so doing, this is considered against current town and country planning guidance, including the development plan which are material considerations, and with reference to the operational requirements of the operators and the attempts to accommodate the particular requirements.

Freshwave/Project Reach

WHP Telecoms Ltd
a WHP Group Company

WHP Telecoms Ltd
401 Faraday Street
Birchwood Park
Warrington, WA3 6GA

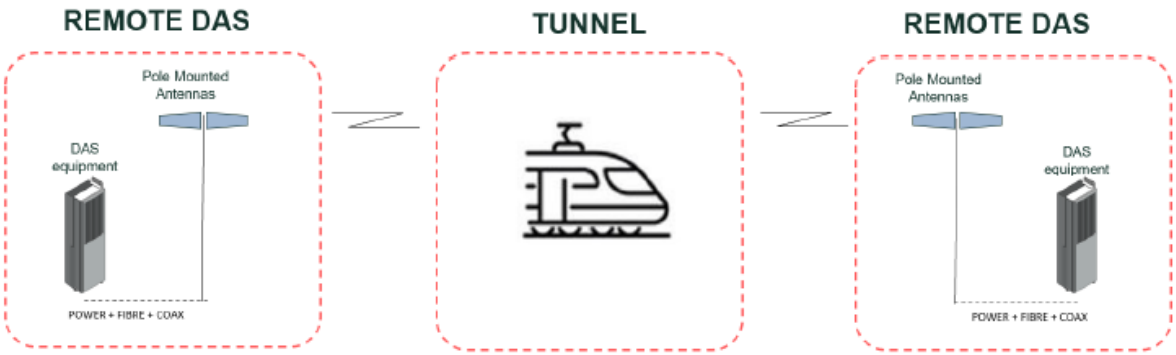
Tel: 01925 424100
Email: info@whptelecoms.com
www.whptelecoms.com

FreshWave has been contracted by Network Rail to implement and manage a multi-operator, multi-technology mobile coverage solution at various Tunnel locations across the UK Rail network.

To provide seamless, multi-operator mobile coverage on trains traveling through tunnels, the proposed solution involves installing directional antennas and handover antennas on both sides of the tunnel to radiate radio signals directly inside. These antennas will be positioned near tunnel entrances where feasible and connected to active Distributed Antenna System (DAS) components. The solution is expected to be applicable to all straight tunnels with lengths of up to approximately 1200m. For longer tunnels, bespoke solutions with potentially intermediate in-tunnel infrastructure may be required.

The solution ensures contiguous coverage inside the tunnel by directing RF signals from both sides into the tunnel. It is designed to provide continuous, multioperator 4G coverage along the entire tunnel length, extending approximately 400 meters beyond each portal to enable seamless handover between the tunnel solution and the MNO macro network.

Pole-mounted antennas and DAS equipment will be installed on both sides of the tunnel. Distances from the pole-mounted antennas and the tunnel portals will generally range from 40 to 100 meters, with a perpendicular offset from the railway tracks of 5 to 10 meters (note this may be reduced to the network minimum of 3 metres under certain circumstance. Antenna heights will generally be no higher than 6 metres above track level. In cases where the embankment besides the rail track is either too steep, or with heavy vegetation, or lacks sufficient space, consideration will need to be given to custom solutions developed on a site-by-site basis. Such solutions may include antennas mounted directly to the brick fascia via a specially designed bracket.



Architecture diagram

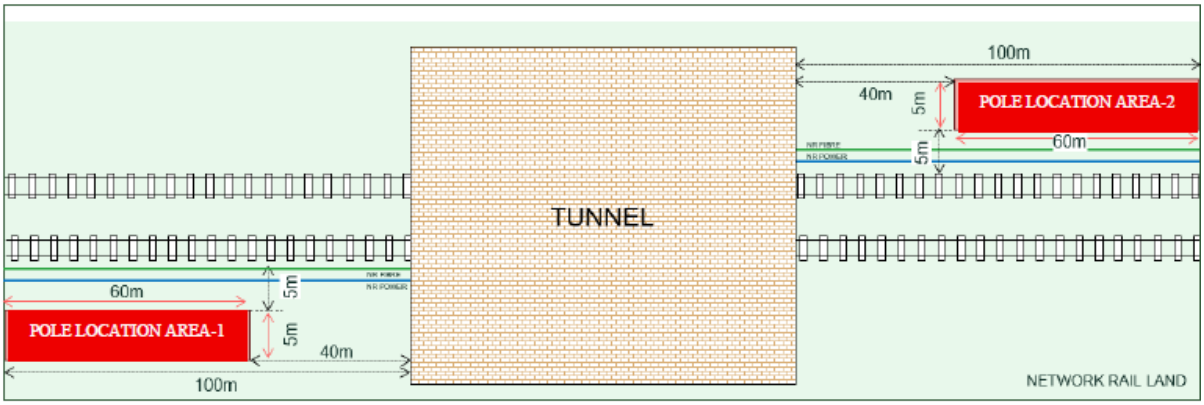
The standard REACH solution will employ Yagi Antennas mounted on fixed vertical poles of varying heights depending upon the requirements of each location (generally up to a height of 6 metres). The intention is to employ low mass pole solutions e.g. of composite construction rather standard steel which cannot easily be transported without specialised equipment. Each pole will be located alongside an equipment cabinet which will contain the Optical Repeater (HRN), Fibre termination and Fused power distribution unit (PDU). The equipment will be designed to comply with all relevant structural and civil engineering requirements as well as Freshwave's own internal standards. Each pole will generally contain 2 (minimum, sometimes 4) yagi antennas. One antenna pointing at the tunnel portal

to provide in tunnel coverage along with a second antenna pointing away from the tunnel to create a suitable 'handover' zone. Each pole will therefore require a clear line of sight to all tunnel portals. Depending on the terrain, each pole will either be installed on a concrete platform or positioned on stable ground capable of supporting the total equipment load. Other mounting solutions will also be considered including ground anchor type solutions.

Two deployment zones, referred to as Location Area 1 and Location Area 2 shall be reserved for the fixed pole and active DAS equipment cabinet (LOC) install.

Foundations shall be designed to ensure the pole does not interfere with railway lines or overhead electrification, including during installation and maintenance operations.

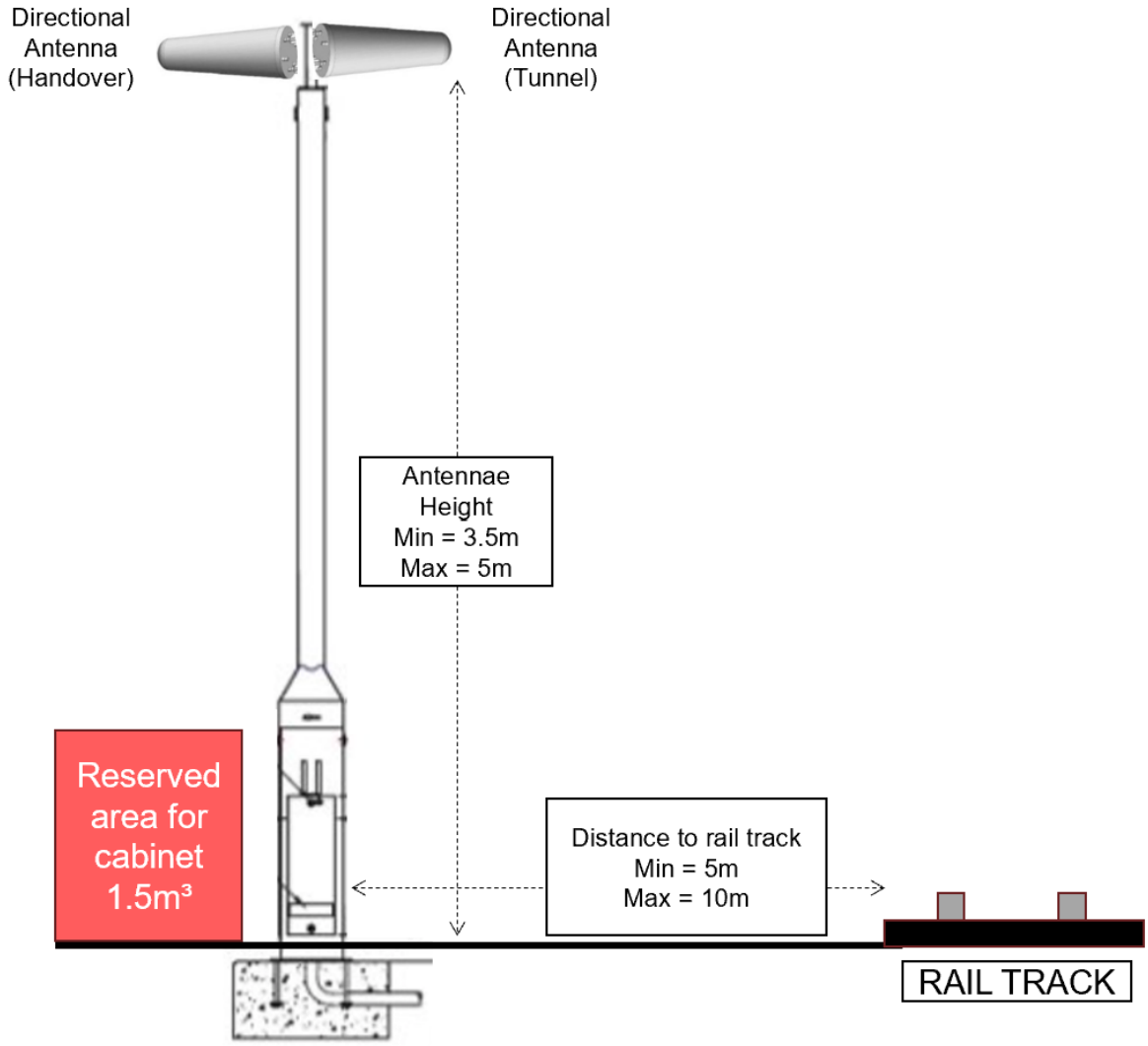
Where feasible poles shall be located where power and fibre connections are accessible on the same side of the track.



Typical tunnel remote DAS deployment type

WHP Telecoms Ltd
401 Faraday Street
Birchwood Park
Warrington, WA3 6GA

Tel: 01925 424100
Email: info@whptelecoms.com
www.whptelecoms.com



Indicative pole mounted antenna and area reserved for LOC install

In some circumstances it may be found that no suitable location exists for the placement of an antenna within the 100m limit. For shorter straight tunnels of length 400 metres or less it can be considered that an optimally placed antenna located at one end of the tunnel will be sufficient to provide through tunnel coverage. In this scenario, the antenna at the other end only needs to provide a suitable handover zone. The maximum distance from the second portal therefore could be increased to 200m. Note that the pole solution should still contain 2 antennas (sometimes 4), one pointing at the tunnel and one away from it along the track. Also note that this option should only be considered if it significantly simplifies the proposed antenna deployment solution. One example of this would be where a very steep inclined cutting extends more than 100m from the portal.

For tunnels of 1600m or less where the installation of internal equipment is problematic, the use of internal antennas fed by feeder from portal mounted HRNs may be considered. Each antenna feed

WHP Telecoms Ltd
401 Faraday Street
Birchwood Park
Warrington, WA3 6GA

Tel: 01925 424100
Email: info@whptelecoms.com
www.whptelecoms.com

would still require its own dedicated HRN(s) but would enable the coverage to be extended into the tunnel from both ends.

The Site

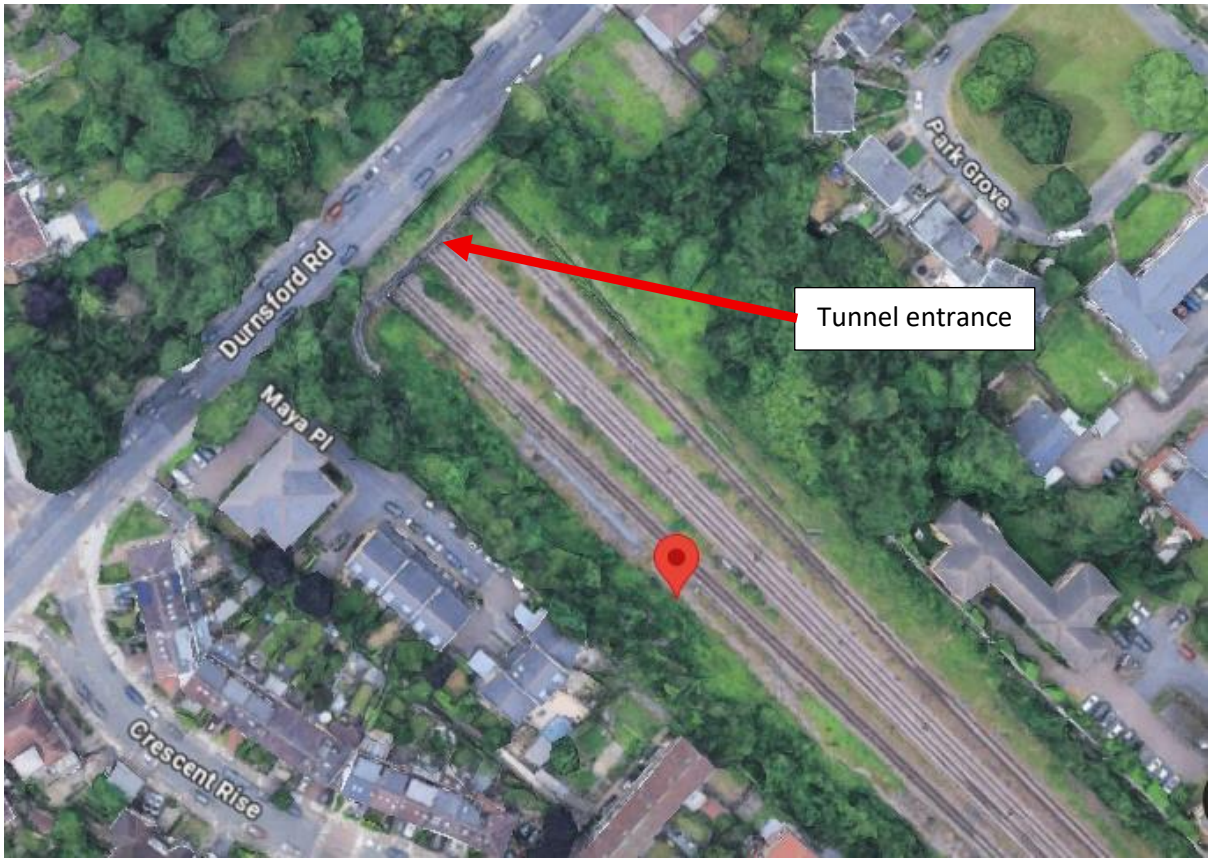
The specific site location is required to allow for the operators' mobile coverage to extend into the Wood Green Tunnel (London End). A separate application for the required equipment at the Wood Green Tunnel (Country End) will be submitted to the relevant LPA. Both locations can be seen in the image below:

The site is located at NGR E529747 N191034 as pinpointed in the below Google Maps image, the application site is the red marker and the tunnel entrance is to the northwest.

WHP Telecoms Ltd
a WHP Group Company

WHP Telecoms Ltd
401 Faraday Street
Birchwood Park
Warrington, WA3 6GA

Tel: 01925 424100
Email: info@whptelecoms.com
www.whptelecoms.com



Further images are below with the approximate site location annotated in red:

Immediately surrounding the site is railway infrastructure with trees and bushes separating the tracks from adjacent development. The track runs in a southeast to northwest direction. The track lies in a cutting at a lower elevation than the adjacent development and is not visible from public viewpoints.

Either side of the Network Rail land there is residential development separated from the site by vegetation as shown in the photos above.

The Proposed Development

- 1no. 6m high glass reinforced plastic pole supporting 2 shrouded yagi antennas – pole, supporting steelwork and antenna shrouds to be painted grey
- 1no. equipment cabinet, dimensions 490mm x 587mm x 1871mm – cabinet to be painted grey
- Ancillary development

If the colours proposed above are not considered to be suitable the applicant is willing to change these as might be requested by the LPA.

The existing context in which the development will be situated is a railway cutting which is part of the established railway infrastructure. This consists of overhead power lines, supporting steelwork, various equipment cabinets, electronic signs and vegetation separating the railway from surrounding development. The scale of the proposed development is small given the pole is a narrow 6 metres high grey column which will support 2 small shrouded antennas along with a small cabinet at the base, all within a compact footprint which will be visually recessive against the existing railway infrastructure and vegetation.

Compliance with Planning Policy and Guidance

The provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (GPDO), under Article 3(1) and Schedule 2, Part 16, Class A, require the local planning authority to assess the proposed development solely on the basis of its siting and appearance. The principle of development is established by the GPDO and the provisions of Schedule 2, Part 16, Class A of the GPDO do not require regard to be had to the development plan. However, the provisions of the development plan are material considerations as far as they relate to siting and appearance.

The National Planning Policy Framework (NPPF) was updated in August 2026. It is a material consideration in the determination of prior approval applications. The key relevant polices are described below.

NPPF (2026) Chapter 9 'Supporting high quality communications'

"The objective of the policies in this chapter is to support the expansion and upgrading of telecommunications infrastructure, in ways which limit an unnecessary proliferation of equipment and respect important environmental safeguards. Advanced, high quality and reliable communications are essential to meet changing technological, social, business and security requirements (including through delivering coverage of higher quality standalone 5G in all populated areas by 2030, and nationwide gigabit-capable broadband by 2032)."

WHP Telecoms Ltd
a WHP Group Company

WHP Telecoms Ltd
401 Faraday Street
Birchwood Park
Warrington, WA3 6GA

Tel: 01925 424100
Email: info@whptelecoms.com
www.whptelecoms.com

CO1: Proposals for telecommunications infrastructure

1. In considering proposals for the expansion or upgrading of electronic telecommunications networks, substantial weight should be given to the benefits of maintaining or improving network coverage, capacity, reliability and resilience, including where significant improvements are required such as along rail corridors. This includes, but is not limited to, providing for next generation wireless technologies (such as standalone 5G), gigabit capable broadband connections and supporting infrastructure such as fibre exchanges. Proposals for such development should:

> *a. Use existing masts, buildings and other structures already employed for this purpose, upgrade, or replace existing infrastructure, unless there is no reasonable opportunity to do so (taking into consideration meeting consumer needs, the efficient operation of the network and providing reasonable capacity for future expansion);*
>
> *b. Be sited and designed to minimise the visual impact of the proposals, especially in situations where a new site or structure is proposed, so far as practical taking into account its operational requirements;*
>
> *c. Not result in cumulative exposure to non-ionising radiation exceeding International Commission guidelines32 when the development is operational; and*
>
> *d. Not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.*

2. In assessing proposals for telecommunications infrastructure, local planning authorities should not require minimum distances to be maintained between telecommunications infrastructure and other development, seek to prevent competition between different operators, question the need for the expansion or upgrading of telecommunications networks, or use health safeguarding standards different from the International Commission guidelines on non-ionising radiation protection.

In response to CO1 1 a-d:

CO1 a. The proposed apparatus is required to provide a highly specific directional radio coverage solution into the Wood Green Tunnel. Existing railway structures do not provide a suitable combination of location, height and orientation to deliver the required coverage and handover functionality to provide the very specific coverage to the section of railway tunnel. As described previously, to provide seamless, multioperator mobile coverage on trains traveling through tunnels, the proposed solution involves installing directional antennas and handover antennas on both sides of the tunnel to radiate radio signals directly inside. These antennas will be positioned near tunnel entrances where feasible and connected to active Distributed Antenna System (DAS) components. The solution is expected to be applicable to all straight tunnels with lengths of up to approximately 1200m. For longer tunnels, bespoke solutions with potentially intermediate in-tunnel infrastructure may be required.

CO1 b. It is confirmed that the proposed solution has been sited and designed to minimise visual impact whilst taking into account its operational requirements. The proposed solution's equipment

needs to be installed on both sides of the tunnel (in this case the London end). Distances from the pole-mounted antennas and the tunnel portals will generally range from 40 to 100 meters (in this case 90 metres), with a perpendicular offset from the railway tracks of 5 to 10 meters (note this may be reduced to the network minimum of 3 metres under certain circumstance. Antenna heights will generally be no higher than 6 metres above track level (in this case 6 metres). Where the embankment besides the rail track is either too steep, or with heavy vegetation, or lacks sufficient space, consideration will need to be given to custom solutions developed on a site-by-site basis.

CO1 c. The proposed solution will not result in cumulative exposure to non-ionising radiation exceeding International Commission guidelines32 when the development is operational. A certificate confirming ICNIRP compliance is contained within this application pack.

CO1 d. The proposed solution will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest. The technical specifications have been agreed with Network Rail.

CO2: Supporting information for telecommunications infrastructure proposals

1. Development proposals for electronic telecommunications infrastructure (including applications for prior approval under the General Permitted Development Order, as amended) should be supported by the following, where relevant:

> *a. Information on the outcome of pre-submission consultation with organisations with an interest in the proposed development (in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area;*
>
> *b. Where a new site is proposed, evidence that the applicant has sought to keep the number of these to a minimum in accordance with policy CO1(1)(a). This should include evidence that the possibility of erecting any antennas on an existing building, mast or other structure has been explored; and*
>
> *c. Evidence demonstrating compliance with policy CO1(1)(c) and (d), including a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection.*

In response to CO2:

CO2 a. The proposed solution has been assessed by Network Rail and to ensure that it complies will all relevant safety communications systems in operation along the railway lines and in train cabins for driver and passenger safety.

CO2 b. An installation at either end of the tunnel (in this case the London end) is the minimum development required to provide the necessary coverage into the tunnel. The proposed installation has been positioned at the lowest practical height necessary to provide the required coverage, with

the pole limited to 6m above track level. Its location within the railway cutting further reduces its visual prominence from surrounding areas.

CO2 c. A certificate confirming ICNIRP compliance is contained within this application pack.

Local Policy Considerations

At local level, the proposal has been considered against Haringey's adopted Development Management DPD which was adopted in 2017 and remains part of the adopted policy framework.

The current telecoms policies are DM3(D) Telecommunications Equipment and DM54 Facilitating Telecommunications Development.

The proposal accords with the relevant telecommunications policies of the Haringey Local Plan, including Policy DM3(D), which seeks to facilitate telecommunications development whilst ensuring that equipment is appropriately sited and designed to minimise its impact on visual amenity and the character of the surrounding area. The modest height of the proposed pole (6 metres), together with the provision of only one equipment cabinet, ensures that the development is limited to the infrastructure required to meet the operational needs of the telecommunications network.

The location alongside the railway is considered appropriate given the established infrastructure character of the site. The proposed apparatus would be read in the context of the established railway infrastructure and would not introduce a visually incongruous feature into an otherwise open or undeveloped landscape. Its modest scale, narrow profile and grey finish would allow it to assimilate effectively with the existing trackside infrastructure and vegetation. The limited scale and compact form of the development would also minimise visual intrusion and avoid unnecessary visual clutter.

The proposal is also consistent with Policy DM54, which supports the provision of telecommunications infrastructure and recognises the importance of facilitating modern communications networks.

It is noted that the proposed telecommunications installation is located within the Bounds Green to Finsbury Park Ecological Corridor.

The ecological corridor forms part of Haringey's wider green infrastructure network and provides an opportunity for the movement of wildlife through the urban area. The proposal has therefore been designed to minimise any potential effect upon the ecological function of the corridor.

Given the small scale and localised nature of the proposal, its position within an established railway environment and the limited extent of the proposed works, the development is not considered likely to materially adversely affect the function of the ecological corridor.

The proposal therefore has appropriate regard to Haringey's policies relating to the protection and enhancement of biodiversity and ecological corridors.

At the London level, Policy SI 6 of the London Plan supports the provision of digital connectivity infrastructure where it is appropriately located and designed.

WHP Telecoms Ltd
a WHP Group Company

WHP Telecoms Ltd
401 Faraday Street
Birchwood Park
Warrington, WA3 6GA

Tel: 01925 424100
Email: info@whptelecoms.com
www.whptelecoms.com

Overall, the proposed telecommunications pole and single equipment cabinet represent a modest and proportionate addition to the established railway infrastructure. The development would provide necessary telecommunications infrastructure whilst minimising its effect on the visual appearance and character of the surrounding area. The proposal therefore accords with the relevant national, London-wide and Haringey planning policy considerations and should be considered acceptable in terms of siting and appearance.

Conclusion

The proposal benefits from the strong national policy support for telecommunications infrastructure set out in NPPF Policy CO1. In particular, substantial weight should be given to the benefits of improving network coverage, capacity, reliability and resilience. These benefits, together with the minimal impact upon visual amenity, weigh in favour of the proposal.

The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operators and minimising environmental impact.

The development will comply with the relevant ICNIRP guidelines on public exposure. A certificate confirming ICNIRP compliance is contained within this application pack.

Should you have any queries regarding this matter please do not hesitate to contact me

Yours faithfully,

Susan McMorrow

Susan McMorrow MRTPI
Head of Town Planning
WHP Telecoms Ltd
Email: s.mcmorrow@whptelecoms.com
Website: www.whptelecoms.com

For and on behalf of Freshwave/Project Reach