

## **DESIGN AND ACCESS STATEMENT FOR ELECTRICITY NORTH WEST**

### **Haile Mine Telecoms Site, Haile, Egremont, Cumbria**

This Design and Access Statement is provided in conjunction with the Supplementary Information, drawings and supporting material included with this planning application.

#### **Introduction**

The proposed development is a 18m high lattice tower on concrete base. There will also be a ground based equipment cabin on concrete base adjacent to the tower and a further small enclosed generator, also on concrete base between the tower and the equipment cabin. The tower will house 2 x dipole antennas, 2 x 0.3m dishes, 2 x 0.6m dishes, and 1 x 0.8m dish. The compound will be enclosed within a 2.4m palisade fence with integral meter cabinet.

The site location is an established telecommunications site which currently houses an existing 15m Airwave Mast. The site is in an isolated location within the former Haile Moor Mine curtilage which lies about half a mile to the East of Haile Village.

The proposed development site is not within an area at risk of flooding and is in Flood Zone 1. The site is outside of the National Park but has the Landscape Type Designation of Dent and Haile Moor Upland Foothills which has notable sensitivities. It is not believed to be close or within impacting distance of any Listed Buildings or Scheduled Monuments.

#### **Pre Application Discussions and Negotiations**

There have been Pre Consultations with Cumberland Council by way of written advice Dated 10 February 2025 Ref PAA/24/0045. This advice highlighted relevant policies as per the 2021-2039 Copeland Local Plan as well as a number of key policies. In particular the advice highlighted the need to demonstrate a sound need for the mast in this open countryside location, and that other alternatives had been investigated.

The advice notes that the landscape should be conserved and enhanced and as such the proposal should not be over prominent, with photo montages from various vistas to illustrate this. Additionally, any protected species or habitats should not be harmed and a 10% Biodiversity Net Gain should be included to accord with Local and National Policy.

The information submitted with this application seeks to address and cover the comments from the pre consultation advice.

#### **Documentation Submitted with Application**

- Plans and elevations
- Supporting Statement and Technical Justification
- Design and Access Statement with Planning Justification
- Photo Montages
- Photographs and Landscape Visual Appraisal
- ICNIRP Statement
- Bio Diversity Net Gain Report
- Arboricultural Report
- Ecological Desk Study



- Construction Related Traffic Movement Plan
- Diesel Generator Specification Sheet
- Map of Discounted Options

### **Design Component**

- Use proposed - Telecoms Mast for ENW internal telemetry network, as per supporting Technical Justification.
- Amount – in this case a mast height of 18m is required to enable the necessary Line of Sight to be achieved to link in the Midway, Egremont, and Beckermest sites, and to improve the PMR network as per the Technical Justification. It is not possible to reliably achieve the required line of sights below this height and the height has been kept to an absolute minimum. In order to be workable at this height the Midway Substation site will also need to be increased in height. It is considered that this balance of heights provides for a better visual impact scenario rather than seeking to increase the height of the subject mast further whilst leaving the Midway site at 15m. The ground based equipment and compound fencing are relatively low in height and in the context of the wider area are unlikely to be seen from anything other than views from Haile Moor Mine itself.
- Layout – the layout of the mine area is as existing with the proposed installation and compound to the south east of the site close to the Airwave Location.
- Scale – the height is commensurate with the technical requirement (see Technical Justification), and the ground based units are dictated by the need to house plant and operational equipment within a secure compound. It was originally believed that the mast would need to be above 20m but through detailed testing and survey work it has been possible to reduce this to 18m on the basis of the increase of height at Midway.
- Landscaping – There is low level tree and hedge screenage around the site, and this will be retained in full (see Arboricultural Report). This will provide cover for the lower third of the mast and also for the cabin and compound. The mast is unavoidably higher than the vegetation in the locality, but it is considered that any impact on the wider Landscape will be very minor. This is evidenced as per the photo montages and Landscape Appraisal.
- Appearance – The design proposed is an 18m lattice mast. This design is similar to the existing Airwave structure on site and will be galvanised steel – so will weather to be grey. The proposed structure is of lattice design allowing a degree of transparency through it and beyond. The ground based equipment cabin is of standard specification and are pre fabricated to be Juniper Green (RAL 160 20 10 – BS 12B29). The Generator also comes pre fabricated and is coloured Goose Wing Grey. The fencing is proposed to remain as galvanised but could be painted if required.

### **Access**

Access to the site can be obtained off the unclassified Hardgate Road/Bleas as it leaves Haile and goes eastwards. The Mine has its own gated access Track to the south with relatively wide visibility splays on either side with clear views up and down Bleas. The track can accommodate HGV access and is suitable for all construction traffic. Further down the track to the site there is sufficient turning space for all maintenance and construction related vehicles. Once built, the site will not require to be manned and visits will be restricted to irregular maintenance visits only. Any impact on the local road network will therefore be negligible.

In terms of construction traffic details are provided on the attached document “Haile Moor Traffic Movements”. In this respect the construction period is around 10 weeks and the access has been assessed as suitable and able to safely accommodate all the vehicles as per the proposed plan.

## Noise

Once built the telecoms site will run with no additional noise apart from an air conditioning unit to the rear of the cabin. This air conditioning unit will run with sound output of 63 dBA. This noise will not be audible above background noise from any residential houses or publicly available areas nearby. In the case of an emergency power outage the diesel generator will run which is as per the attached specification sheet. This generator is compliant to British Regulations and will produce a sound level of 62 dBA at 7m. The generator will run very infrequently and is not likely to create noise above ambient levels close to any residential properties.

## Alternative Site Options

In selecting this location a lot of technical research and planning has been undertaken. The location must be one that balances the technical requirement with the optimum location in terms of planning policy and visual impact.

The site selection process is explained in more detail as per the Technical Justification but the primary and overriding requirement is a site that is able to obtain a reliable line of sight to the other key node points – Egremont and Midway (Beckermest is more easily achievable). If this requirement is not met, then the site is effectively unusable for the purpose.

In this context existing sharable structures are the first step in the site selection process and ENW would use such structures (if available), before proposing a stand alone mast. In this respect the following existing sites have been discounted and are shown on the Discounted Options Map and covered in the Technical Justification.

Existing Airwave Mast at Haile Moor Mine – this mast is not structurally capable of housing the complement of equipment that ENW require in its current form. It is also not tall enough being c15m (18m+ required). Whilst a full redevelopment may be possible this would require a much bulkier and taller structure, the visual impact thereto likely being greater than two slimmer stand alone masts. There is an additional issue with this mast on the basis that both Airwave and ENW are operators of Nationally Significant Infrastructure – and housing both on the same mast is very much sub optimal from a security and resilience perspective - and is discouraged by both Companies Security Advisors.

Arqiva Site, Whitehaven, Ivy Hill – this mast does not provide the necessary clear line of sight due to ground clutter, tall trees, and existing Electricity Pylons (which will be remaining). The sight lines would also pass over the Sellafield site where there is potential for critical path blockages from cranes etc during the decommissioning works.

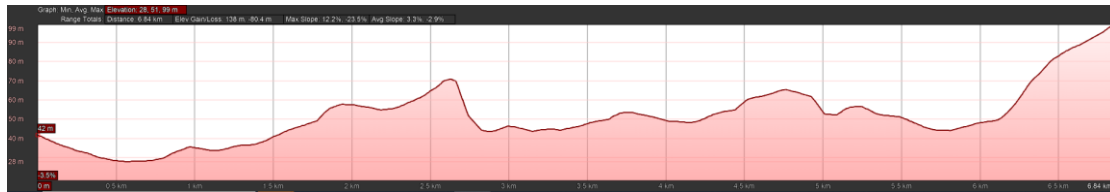
Arqiva Site, Bigrigg – this mast is currently housing equipment for mobile phone operators and cannot structurally accommodate the additional kit required for the subject application. In order to house the ENW equipment with the existing would require a complete rebuild with taller and bulkier structure with no guarantee of planning success, and is also likely to be economically unviable.

Sandwith ENWL Radio Site – This site is already an operational ENW mast. Unfortunately, it does not have a clear line of sight with Egremont or Midway so is unsuitable for the purpose.

Energy Coast Business Park – This business park is located to the south west of Haile and is an industrial/commercial location. A site was considered here but it is lower than the subject site and cannot link into the Midway location due to this topographical challenge as well as a grouping of tree clutter close to the Midway Site. More importantly there is a higher hill between the Business Park and Egremont which would also block that link unless the subject mast was

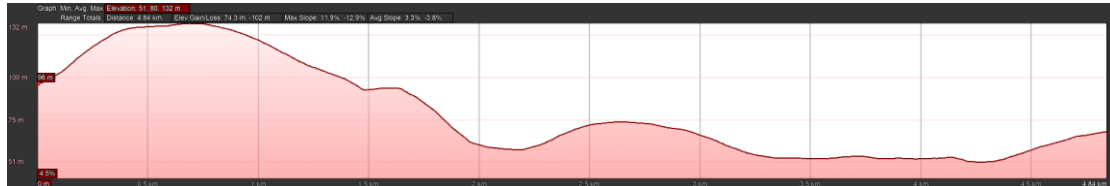


higher than 35m – which is almost twice as tall as the proposed mast at Haile. This topography is shown below;



Midway

Business Park



Business Park

Egremont

### National Planning Policy

The National Planning Policy Framework supports high quality communications and acknowledges that such development is essential for social wellbeing. Sites should be kept to a minimum and sympathetically designed. Technical evidence should be provided to justify the proposed development, and the use of existing buildings and structures should be investigated. This proposal complies with this policy as existing buildings and structures have been considered and the technical information supplied with the application justifies the proposed development.

### Local Planning Policy

The following Copeland Local Plan Policies are considered relevant to this application;

#### DS2 – Settlement Boundaries

The subject Site lies outside any designated settlement boundaries and is located in open countryside. Accordingly, there needs to be a proven need for the proposal to justify the location in this context. This need is illustrated by the information provided in the technical justification and the discounted options referenced within the application. In particular, the Energy Coast Business Park has been discounted on technical grounds as have all other existing mast sites (for sharing) in the locality. It should also be noted that the subject site is home to an existing similar structure and whilst being open countryside it could also be classed as a brownfield location given the previous mining use and existence of former mining buildings adjacent. On this basis it is considered that the application site is more suitable than any other workable alternative site that would likely be in a more sensitive open countryside location.

#### DS4 – Development Standards

This Policy seeks to ensure all new development meets high quality design standards which contribute positively to the health and wellbeing of residents. By its nature the proposal is somewhat restricted in terms of the construction and physical appearance – the installation has to be functional in reaching a desired height and the imperative is to house the required antennas in order to deliver the technical solution. The mast will however be of lattice design to allow a degree of transparency and will be of galvanised steel that will weather to blend in with the wider landscape when viewed against a backdrop of land or sky. The ground based equipment cabin will be coloured green to match the low level vegetation, and the fencing can be left galvanised or coloured if required.

The site will not be public so there are no on site enhancements required to encourage social interaction or wellbeing. Similarly, the site will not use water, create noise (save as very irregular generator use and an air conditioning unit), or have anything other than a negligible impact on the local highway network once constructed.

#### DS5 – Hard and Soft Landscaping

The proposal does not remove any hedgerows, trees or other wildlife features and the natural landscape will therefore remain unchanged with the exception of the concrete bases, cabinets, and fencing at ground level. There will be no additional hard landscaping with no change to the existing situation. The Arboricultural, Bio Diversity, and Ecological assessments supplied with this application provide more detail in this respect. The applicant is proposing to plant 9 additional small trees on the wider site in order to achieve the 10%+ Biodiversity Net Gain Metric.

#### DS6 – Reducing Flood Risk and DS7 – Sustainable Drainage

The site is not within an area at risk of flooding and lies in Flood Zone 1. Accordingly, it has a low risk of flooding. There will be no mains water to discharge, the surface water volume will therefore remain the same albeit the concrete foundations will create a marginal loss of permeability. Apart from the bases the site will be pebbled which will improve the permeability in a sustainable way and more than compensate for the increased run off from concrete bases. Surface water will then disperse into the natural watercourse as it does currently. The Flood risk in reflection of the above will remain unchanged.

Strategic Policies NU1 - Supporting the Development of the Nuclear Sector, NU3 - General Nuclear Energy and associated development and Infrastructure, NU4 – Nuclear and associated development at Sellafield

With respect to nuclear development the proposal is required as a result of direct and indirect consequences. The indirect consequences are covered in detail in the Technical Justification in that the “Cumbria Ring” requires upgrading to allow for clean energy development in the Sellafield/Moorside area. Essentially this will increase the capacity of the electricity network to cater for the potential increase in nuclear power generation as well as other new technologies and green energy sources.

It is the upgrade of this network of pylons that has created the need for the subject site in that the existing fibre links thereon (that provide the current network remote switching resilience) will be removed. Without an alternative solution for this connectivity much of the wider local network will be at risk.

The direct consequence of the proposed installation is therefore the continued reliability and improvement of the local electricity network. This is imperative for energy producers putting electricity into the grid, and also for electricity users who require the energy for their operations. In this respect a nuclear energy development is both a producer and a user.

The proposal is therefore a constituent part of the wider improvements in the local electricity network that are required in order for economic development and employment in the area. This is in a large part to support the potential for nuclear development in accordance with policy NU1 and NU3.

#### N1 – Conserving and Enhancing Biodiversity and Geodiversity, N3 – Biodiversity Net Gain

In line with the Ecological Desktop Assessment and the Biodiversity Assessment it is considered that this proposal does not create any harmful impact on the Biodiversity and Geodiversity of the surrounding area. All nearby existing trees and vegetation will be retained, with the exception of the compound area which is currently grassland.

The application does however provide for a Bio Diversity Commitment of a 10.61% increase in line with Local and National Policy Guidance. This is achieved by additional small tree planting around the wider site. The Bio Diversity Report covers this aspect in more detail.

#### N6 – Landscape Protection

This policy seeks to protect all landscapes from inappropriate change as a result of the development. The subject application is by its nature necessarily 18m high which is unavoidable. The selected location is however considered to be one where there is a minimal amount of adverse Landscape change. This has been achieved by co locating with an existing vertical structure and selecting a site which is not overly prominent from multiple vistas. Whilst it would be seen from some viewpoints, in the context of the overall wider views of the area the visual impact is considered to be only very minor.

This is evidenced from the photo montages that show an element of vegetation screenage at low level from the nearer views (Bleas), and Haile Village, and only a small protrusion of structure against the wider skyline. In terms of the more distant views contained within the Landscape Appraisal it can be seen that the proposal would be almost unseen from most sensitive viewpoints. This is covered in more detail in connection with the Landscape Character Section but notably when viewed looking out from the National Park onto the Heritage Coast, or into the National Park from close to the A595 the proposed mast is very much subsumed into the landform backdrop and is not skylined. It can also be noted that the buildings associated with the Energy Coast Business Park and the Sellafeld site are much more prominent features on the Landscape than the proposed mast.

In light of the above any minor visual landscape harm is considered to be outweighed by the need for the site as per the Technical Justification.

#### N14 Woodland, Trees and Hedgerows

An Arboricultural Report has been provided with this application. To this extent it confirms that no existing trees or hedgerows will be removed, pruned or damaged as a result of the proposal. It also confirms that there are no TPO or veteran trees within impacting distance. Accordingly, the proposal is compliant with this policy.

#### BE1 – Heritage Assets

The subject site is not within close proximity of any Heritage Assets. Clearly the Lake District National Park is around 1.5km away but is not considered to be impacted in terms of its significance or character. The views of the mast from inside and into the National Park are not affected adversely as per the Landscape Assessment. The Heritage Coast is more distant to the west and again is realistically unaffected by the proposal. There are 7 Listed Buildings in Haile which again are not considered to be affected visually or architecturally.

#### BE3 – Archaeology

The subject site is not known to be of potential archaeological interest according to the research carried out by ENW. No items of archaeological interest have been discovered during the Pre Build Feasibility Ground Investigations and the previous mining use is not usually consistent with sites of archaeological interest. Should any items of interest be found during the build then they will be preserved and further advice will be sought from the Planning Authority.

#### CO1 - Telecommunication and Digital Connectivity

This policy is supportive of improvements in digital technology across the borough albeit this is mainly aimed at the accessibility of 5G services and full fibre technology for personal and business use. The proposal is not a direct contributor to this element of connectivity but of course they all require a reliable electricity supply to operate. In this respect, the proposal will without doubt result in fewer power outages and less down time.

In line with this policy and the discounted options section, mast sharing has been considered, the site has been selected to be remote from important heritage assets, and sites of high



biodiversity value. The Landscape impact has also been kept to a minimum in the context of the need and the unavoidable open countryside location.

### **Landscape Character and Visual Amenity**

The subject location is designated within the Copeland Landscape Character Assessment beyond Settlements (2021) as Dent and Haile Moor Upland Foothills. It is also classed as High Fell Fringe as per the National Park Character Assessment.

Key features of this landscape character include:

- Topographically, landscapes within this type vary from 100m to 300m AOD;
- A transitional landscape, between more open moorland or fell and lower, more enclosed landscapes;
- Hills are dissected by numerous streams and minor river valleys;
- Predominantly improved pasture and meadows with a pattern of stone walls giving way to hedges at lower levels;
- Small patches of woodland on steeper slopes and alongside streams and rivers, with numerous field boundary trees and tree clumps occurring around farms.

The general condition of this Character Type is considered to be good. In terms of development large scale renewable, other energy and pylons could impact negatively on the skyline, and erode the undeveloped character of this landscape.

The proposed development here will have an almost neutral impact on physical, ecological, cultural and historic character of this designation as it will create a very minor localised change in the context of a much wider area. It could be considered to have a very slight impact on the aesthetic and perceptual character but this is limited and mitigated by the existing vegetation cover at low levels and lack of skylining when viewed from (say) Cold Fell which is just within the park (see photo montage). The utilisation of a site where there already an existing structure also satisfies the desire to limit the prominence of multiple vertical structures on the basis that any alternative would have a greater separation distance and most likely need to be taller.

A review of the impact that the mast would have on the landscape and its character has been undertaken. The existing Airwave mast is in place which assists in determining the locations where it is visible and assess the significance of the proposal for a new mast of 18m in height. The Visual Assessment is included as a separate document as part of this application.

### **Residential Amenity**

There are isolated residential properties in this locality, the nearest to the proposal being Braymoor which is almost opposite the access road to the mine. This property is still around 280m from the proposed installation and will not be reached by any noise or other disturbance. The mast will be visible from the front facing elevations although the impact on the wider visual amenity is considered slight in the context of there already being one mast present.

The next nearest properties are the two Haile Moor Cottages which are around 350m away. Photographs from here are included in the Visual Appraisal Document and again the existing mast is visible albeit screened by vegetation, trees and the former mine building. The proposed mast would be visible in the same field of vision although the additional impact is considered low in the context of the wider landscape.

There are more residential properties further away and concentrated in Haile Village – the nearest being 750m away. The additional visual impact here is referenced in Viewpoint 3 of the photo montage and is considered to be low in terms of harm.

## **Summary**

The additional visual impact of the proposal in this case is considered to be slight – this is due to the presence of a similar existing structure, the partially screened location, and low impact from wider sensitive viewpoints and from longer range views. The information within this application also illustrates there is little to no ecological impact, and there will be above the required 10% biodiversity metric accommodated in the scheme.

Most importantly the Electricity Network in this area needs to be upgraded for the benefit of the domestic customer, the local and rural green economy, and in order for ENW to comply with its Operating Licence Obligations. This is currently only possible if ENW can develop the communication network described in this application. On this basis it is considered that the planning balance should be in favour of this development in the context of any slight impact that the new mast may have on the local environment.