Planning Statement for the Development of an Electronic Communications Base Station

Moor Road (A5093), Knott End, Millom, Cumberland, LA18 5DZ

On behalf of Anglian Water Services Limited

Date: February 2026 | Pegasus Ref: P24-2528 (LA132)

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Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
Rev.1	February 2026	RM	RM	

Contents.

1. Introduction

1.1. This Planning Statement accompanies an application for prior approval made on behalf of Anglian Water Services Limited which is managed by Arqiva Limited, for the development of an electronic communications base station.

1.2. This application includes:

- A description of the site and surrounding area
- A description of the proposal
- A review of planning policy considerations
- A review of design and access considerations

1.3. A number of other accompanying documents have been submitted in support of the application and these are referred to and should be read in conjunction with this statement as listed on the covering letter that accompanies this submission.

2. Overview of Anglian Water Services Ltd and the Smart Metering Project

2.1. Anglian Water Services Ltd (hereafter referred to as simply Anglian Water) is the largest water and water recycling company in England and Wales by geographic area. They supply water and water recycling services to almost seven million people and businesses in the East of England from the Humber in the north to the River Thames in the south, including the Great Ouse and a small part of Greater London.

2.2. As might be expected with the operation of such a large infrastructure network, the requirement for monitoring live data is considerable, constant and crucial to planning for better network maintenance and operational efficiency. Across hundreds of operational and monitoring sites around the UK, Anglian Water are able to keep their network under constant review, utilising the near instant exchange of digital information to make informed and up-to date decisions on water network management. Accordingly, many Anglian Water sites will feature items used for digital communication such as transmission dishes, aerials, antenna and equipment cabinets. The role Anglian Water plays in the delivery of water utilities infrastructure and their reliance on digital communications to support this delivery is reflected by Ofcom in designating Anglian Water an Electronic Core Operator under the provisions of the Communications Act 2003, in accordance with the Electronic Code (Communications and Restrictions) Regulations 2003, as amended.

2.3. Smart Metering is a Government initiative to cut greenhouse gas emissions, decarbonise the economy and support the creation of new green jobs and technologies. Anglian Water are now seeking to build and develop their Smart Meter communications network and have identified the application site as an appropriate urban location to deploy the equipment. It is intended that this technology is rolled out on a national basis in the months and years to come.

2.4. Smart Meters are the next generation of water utility meters. They will offer a range of intelligent functions and provide consumers with more accurate information and bring an end to estimated billing. Consumers and Anglian Water will have a near real-time information stream on their water consumption to help them control and manager usage, save money and reduce carbon emissions. By providing these benefits it's argued that smart metering assists in achieving the goals of sustainable development which represents one of the UK Government's key priorities in the transition to Net Zero.

2.5. The Smart Meter programme, like all electronic communications networks, will need to be supported by an infrastructure of operational sites with the required antennas and other apparatus needed to provide radio coverage to the local area. As the Smart Meter network must be able to communicate with meters that are typically found in the heart of a property, for example, in an under stairs cupboard, then the sites must be developed in locations that can provide the required level of coverage.

3. The Application Site

3.1. The application site is located on Moor Road (A5093) within the built-up area of Millom. The site lies within a grass bank on the south side of Moor Road, adjacent to a pavement area and Millom Hall. The northern side of Moor Road within the vicinity of the application site is comprised of hedgerow interspersed with small trees. As can be seen in the below photograph of the application site, there is existing street furniture within the vicinity of the site including lampposts, road signage and telegraph poles with overhead wires intersecting the site.

Photograph 1: The Application Site

3.2. The nearest residential properties to the site are situated to the north on the opposite side of Moor Road, approximately 20m away. Interchangeable views of the site are limited by virtue of the hedgerow verge seen in the above photograph. Houses on Queen's Park to the south are 40m distance or more and are generally orientated to face away from the application site.

3.3. In terms of planning constraints, the site is unprotected land within the settlement boundary. There are no landscape, heritage or ecological constraints that affect the site or the immediately surrounding area. Millom Conservation Area is over 50m to the east at its closest point. The site is not at risk from flooding from any flood source.

3.4. A review of local telecommunications base stations shows limited existing digital communications infrastructure in the vicinity. There are no existing telecommunication sites or tall buildings within 200m of the application site.

3.5. There is no planning history in relation to the site.

3.6.

4. The Development Proposed and Alternative Sites Considered

The Development Proposed

4.1. The development proposed is shown in detail in the drawings submitted and is for a new digital communications mast, being comprised of a 12m monopole which will support an Omni Antenna at a mean height of 13.83m. Ancillary equipment which is to be installed consists of a GPS Module, Collinear Antenna and Cabinet. Groundwork will be required to provide a retaining wall and flat area to deploy the installation.

4.2. The mast itself is a slimline structure, the width is comparable to existing lampposts in the surrounds. At the base, it's widest point, the mast is 200mm wide. It then tapers down to approximately 120mm wide at the top where the antenna is fixed. The digital mast will provide digital communication services for Anglian Water only. It will not provide conventional mobile communication connectivity to mobile network operators.

4.3. The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to digital connectivity and data transfer coverage to Millom area, having regard to the need to minimise visual impact. Accordingly, the minimum height for the mast proposed will allow for the necessary provision of coverage whilst preserving local amenity.

Alternative Sites Considered

4.4. The purpose of the installation is to provide smart metering services to the western side of Millom. In order to provide this service, a mast must be geographically related to the area which it is intended to serve. In this case, the operator has focused their search within the existing built up area of Millom where there is existing street furniture and foliage that is capable to providing visual softening of the installation. The topography of Millom is also a consideration where masts are generally more capable of providing coverage to any given area where they are situated at higher elevation. The application site is well positioned in both these respects. Network radio planners have assessed that the location selected will be capable of providing the coverage required to deliver the Smart metering service where a 12m structure would be required (as opposed to a larger or taller structure that may be required on lower ground that did not relate well to the target area).

4.5. Alternative sites were considered and discounted are outlined in the below table:

National Grid Reference	Reason for Discount
E: 316771 N: 480246	Land to the west, along the A5093, was considered. This site was discounted on the basis that existing foliage would screen a proportion of the radio signal from the site and prevent Smart Metering services from reaching surrounding properties. The site was discounted on this basis.

E: 316750 N: 480109	Land to the south was considered. To the south, the topography of Millom is such that land slopes away. Consequently a structure far in excess of the 12m proposed would be required to provide a comparable level of coverage. A larger structure was assessed as being visually unacceptable in this area and the site was discounted on this basis.
E: 317160 N: 480186	Land to the east was considered, at the Station Road/St George's Road roundabout. This site was discounted on the basis that it is within a Conservation Area and the proposal would likely be assessed as resulting in less than substantial harm to a designated heritage asset. The application site is considered as preferable since no harm to designated heritage assets would result.
E: 316574 N: 480337	Land to the north of the application site was considered but there was too little space on pavement areas around Holborn Hill to accommodate a scheme.

5. Pre-Application Engagement

5.1. In terms of pre-application Engagement, pre-consultation letters were sent to the following key stakeholders on 23rd January 2026:

- Cumberland Council Planning Department
- Local Ward Councillor Bob Kelly

5.2. At the time of submission, no responses were received and we would be happy to address matters during the determination period.

6. Compliance with Planning Policy and other Material Planning Considerations

6.1. The relevant planning policy and best practice frameworks is found principally within:

- National Policy, especially in the National Planning Policy Framework (2023);
- The Local Policy Framework set down within the Copeland Local Plan 2021-2039; and
- The Code of Practice for Wireless Network Development in England.

6.2. From these documents can be discerned the general planning policy framework that exists for improved connectivity, guidance for electronic communications development, and site-specific policies and the key considerations relevant to development at the application site.

6.3. 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. We highlight, however, that Part 16 of Schedule 2 to the Town and Country Planning (general Permitted Development) (England) Order 2015, as amended, does not require the Council's determination of siting and appearance matters to have regard to the provisions of the Development Plan for the simple reason that planning permission has already been granted by the Order. Nevertheless, we trust that the information provided will assist the Council to understand how the siting and design of the development, as well as the public benefits of providing improved connectivity, and country planning, and other material considerations.

Copeland Local Plan 2021-2039

6.4. Strategic Policy CO1 relates to telecommunications and digital connectivity stating the following:

> *The Council will support the continued provision of infrastructure that extends and improves digital connectivity across all parts of Copeland, particularly where it provides access to 5G and gigabit capable full fibre technology.*
>
> *New development will be supported where it enables the enhancement of Copeland's digital infrastructure without harming the existing street scene or amenity; mast sharing should be considered where possible. Adverse impacts on the successful functioning of existing digital infrastructure should be avoided or mitigated where possible.*
>
> *This will be subject to appropriate safeguarding to protect sensitive sites, including those protected for their biodiversity value, important landscapes and heritage assets.*

6.5. The mast will play a key role in delivering digital connectivity infrastructure for Anglian Water, a statutory undertaker providing essential services. The infrastructure will support operational communications for water management, environmental monitoring, and real-time data transmission, enabling Anglian Water to deliver safe, efficient, and sustainable water services. In this regard, the development makes a material contribution to

infrastructure resilience, ensuring that key utility services remain reliable, efficient, and responsive to operational demands and environmental conditions.

6.6. This type of infrastructure investment directly supports the economic and environmental pillars of sustainable development. By facilitating improved communications across Anglian Water's operational areas, the mast will enable greater efficiency in water resource management, support leak detection, improve response times to incidents, and reduce unnecessary travel and duplication of effort—all helping to lower carbon emissions and environmental impact. These operational efficiencies ultimately benefit the wider community, even if the mast does not provide direct public-facing telecoms services.

6.7. While the structure differs from conventional built development, its siting, scale and design have been thoughtfully considered in relation to the surrounding context. The monopole responds appropriately to local character by being situated within a roadside verge characterised by street furniture of comparable scale, where there is a mix of height and massing in development form. Its slimline, vertical profile is sympathetic to existing street infrastructure and avoids unacceptable visual contrast or dominance within the setting.

6.8. Although the scheme does not seek to reinforce architectural character in a traditional sense—given its utility nature—it maintains an unobtrusive design that respects surrounding development patterns. The mast will not adversely affect the historic environment; the site lies outside of any Conservation Area and is not in proximity to any designated or non-designated heritage assets. The development also respects the amenity of nearby land uses, including residential areas located on a main road, not directly overlooked by residential properties. Its passive function means there is no expected noise, light, or traffic impacts, and as such, the proposal does not create any unacceptable conditions for surrounding users or future maintenance personnel.

6.9. The development benefits from direct access off Moro Road, minimising the need for new roads or infrastructure. As such, it does not impact upon pedestrian or highway safety, and no new connections, street furniture or ancillary features are proposed, reducing the potential for visual clutter. Waste and recycling provisions are not relevant to the proposal, and any minor works to the verge or hard surface for utility access will be reinstated in agreement with the Highway Authority.

6.10. The mast also supports broader environmental sustainability by enabling Anglian Water to enhance operational efficiency through remote monitoring and communications. This helps reduce manual site visits, respond more quickly to incidents, and lower vehicle emissions, supporting long-term environmental management goals. Given its scale, position, and environmental sensitivity, the proposal has been designed to integrate effectively with the surrounding landscape, limit landscape and ecological disruption, and avoid adverse effects on townscape or character. It therefore accords fully with the relevant design policies of the Local Plan and presents as a modest, well-considered form of critical infrastructure.

7. Design Considerations

7.1. The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However, 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 listed in Appendix A of the Code of Best Practice.

Amount, Design, Layout and Scale of the Development

7.2. The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide a replacement service to the area, having regard to the need to minimise visual impact, already referred to elsewhere in this statement. With regard to the main component elements of the development proposed:

- The design and height of the proposed mast is led by the operational and technical factors of providing coverage. Whilst the structure proposed will be evident from some nearby views, the monopole will help ameliorate presence over distance, especially from views where there is a background or foreground of vegetation. That said, the local topography will limit such views from public vantage points and any sensitive visual receptors.

- The mast required cannot be hidden, but any impacts on the landscape and visual amenity will be limited and moderated by confining height to what is required for operational reasons. Compared to other forms of vertical infrastructure also found in the landscape, the mast proposed is a benign structure: it is much lower than television broadcast masts; it is lower and does not form a sting of structures that march across the countryside like electricity transmission towers; and it does not move like wind turbines, which are typically higher and are usually developed in clusters.

Equipment Proposed

7.3. The equipment proposed and its size has been kept to a minimum necessary to provide the required level of service. The design of these features is very much driven by operational and technical factors.

Equipment Cabinet

7.4. The size of the equipment cabinet has been limited to what is required to meet the operator's current and foreseeable network requirements. The location and design, and the electronic communications equipment housed within, reflects the functionality and the technical and operational requirement to be in reasonable proximity to the mast equipment. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Access Considerations

7.5. Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.

7.6. In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorized 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.

8. Health and Safety

8.1. Every installation on a site owned or managed by Arqiva Limited will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.

8.2. 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.

8.3. 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.

9. Summary and Conclusions

9.1. In summary, the application is in respect of a new base station for a new digital communications mast, being comprised of a 12m monopole which will support an Omni Antenna at 13.86m. Ancillary equipment which is to be installed consists of a GPS Module, Collinear Antenna and Cabinet. Groundworks are required to facilitate the mast.

9.2. The digital mast will provide digital communication services for Anglian Water only. It will not provide conventional mobile communication connectivity to mobile network operators.

9.3. As is demonstrated in this statement, all reasonable steps have been taken to minimise the visual and other impacts of the development, having regard to the technical, operational, and town and country planning constraints that apply.

9.4. 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.

9.5. 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 within the NPPF and the Government's Digital Strategy. 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.

9.6. 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

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