Planning Statement for the Development of an Electronic 'Smart Metering' Communications Mast

Copson Street, Withington, Manchester, Greater Manchester, M20 3HE

On behalf of United Utilities PLC

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1. Introduction

1.1. This Planning Statement accompanies an application for prior approval made on behalf of United Utilities PLC which is managed by Arqiva Limited, for the development of an electronic communications base station associated with a 'smart metering' project.

1.2. This Planning Statement provides

- 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 and drawings 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.

Smart Metering

1.4. Smart meters are the next generation of gas and electricity meter. They are being installed in homes across Great Britain at no extra cost, to replace tradition meters, including prepay key meters. Smart meters record your energy use in the same way as a traditional meter but then send the readings automatically to energy suppliers at regular intervals, allowing them to prepare an accurate bill.

1.5. Smart meters measure how much gas and electricity is used and securely share this directly with energy suppliers at regular intervals. This eliminates the need for manual meter readings.

1.6. The Department for Energy Security and Net Zero and Department for Business Energy & Industrial Strategy has published a guide for smart metering. The Government explain that *"Smart meters are underpinning the transition to a greener, more reliable energy system. Our latest analysis shows that the rollout is delivering more benefits to the country than it is costing to deliver."* And:

- Engineers will know much faster when power cuts have occurred and will have better information about what caused them. This will enable them to conduct quicker and cheaper repairs and reduce the risk of similar problems occurring in the future.
- Smart meters are also helping to reduce our reliance on imported fossil fuels. For example, innovative smart tariffs allow consumers to save money by using energy away from peak times or when there is excess clean electricity available. Some customers have even been paid to use electricity during very windy days.
- Consumers can opt for electric vehicles, heating systems and smart appliances, such as washing machines and dishwashers, that can connect to the smart metering system to access pricing data. Activity can be programmed to automatically take advantage of cheaper rates, reduce the impact on our energy grid and save consumers money.

2. Overview of United Utilities and the Smart Metering Project

2.1. United Utilities PLC are one of the largest water and water recycling company in England. They supply utilities services to almost seven million people and businesses in the northwest of England. 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, United Utilities 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 United Utilities sites will feature items used for digital communication such as transmission dishes, aerials, antenna and equipment cabinets. The role United Utilities plays in the delivery of utilities infrastructure and their reliance on digital communications to support this delivery is reflected by Ofcom in designating United Utilities 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.

2.2. Smart Metering is a Government initiative to cut greenhouse gas emissions, decarbonise the economy and support the creation of new green jobs and technologies. United Utilities 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 required for the efficient and effective operation of their digital communications network. It is intended that this technology is rolled out on a national basis in the months and years to come.

2.3. Smart meters are the next generation of 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 United Utilities 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.

2.4. 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 Copson Street, at the corner of the junction with Hill Street. The area subject of the application is a wide section of pavement area that is located to the west of Hill Street, on Copson Street. Immediately to the rear of the Site is a care park that serves adjacent commercial units associated with Withington Town Centre. To the rear of the car park facing onto Old Moat Lane is an apartment block. There is an existing 20m tall telecommunications mast situated approximately 10m to the west of the Application Site which is visible in the below photograph of the site, looking west along Copson Street toward the Site.



Photograph 1: Application Site as existing

3.2. The Application Site is a flat part of the existing pavement without any existing above ground constraint. There is a row of street trees within the car parking area to the immediate south of the site which measure approximately 4m-5m in height. The pavement width between the car park edge and the highway of Copson Street is 4m.

3.3. There are numerous vertical elements of street furniture distributed around the vicinity of the Site including street lighting columns approximately 8m – 10m in height.

3.4. There are no specific planning constraints affecting the Site; it is not situated within a conservation area and there are no designated or non-designated heritage assets within the setting of the Site. There are landscape or townscape designations that affect the Site and it is not allocated or designated for any specific purpose within the Local Plan.

3.5. There are no Article 4 directions removing permitted development rights for the installation of communications equipment.

3.6. The Site is situated within Flood Zone 1, the area least at risk from flood events, and is not within an area at risk from surface water flooding.

3.7. There is no planning history for the Application Site itself. The existing 20m telecommunications mast to the west was approved in January 2024 under LPA Reference 138697/TEL/2023.

3.8. Land to the east of the site is generally characterised by retail and commercial units associated with Withington Town Centre, many of which face onto Wilmslow Road, a major arterial road running town Manchester City Centre to the north. Land to the west is generally characterised as residential with the majority of properties being detached or semi-detached houses set within garden areas.

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 sitting at the top of the mast at a mean height of 13.45m. Ancillary equipment which is to be installed consists of a GPS Module, Collinear Antenna and 1no. Equipment Cabinet.

4.2. The mast will provide digital communication services for United Utilities 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 Withington and the wider 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. To achieve the required coverage, Arqiva's radio planners first identified a search area in which a new site would need to be deployed. Being within this area is vital in ensuring the coverage is achieved whilst not interfering with other sites in the region that serve the same purpose as this would result in cell overlapping. The below map shows the defined search area which is a circle with a 100m radius from the centre of the search area which itself is within Withington Town Centre.



Map 1: Defined Search Area

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

National Grid Reference	Reason for Discount
E: 384769 N: 393059	This relates to pavement space outside of the Co-Op supermarket to the east of the Application Site. It is within the cell search area. Acquisition agents discounted this location as an alternative because the pavement is too narrow to accommodate the mast and preserve safe pedestrian movement.
E: 384818 N: 393045	Consideration was given to pavement space outside this retail unit. As well as the pavement being too narrow, concern was also raised that an installation in this location would harm visibility splays for vehicles and cyclists moving through the area and that an installation would not be safe on this basis.
E: 384881 N: 393007	There are several buildings surrounding this location that are greater than two storeys in height. A 12m mast in this location would not be able to propagate signal over the target area because the existing tall buildings would obscure signal. Consequently, a mast much taller than 12m would be required in order to provide coverage, at least 20m in height. Such a mast in this location, close of the boundary of a conservation area to the east was considered unacceptable and this option was accordingly discounted.

Table 1: Discounted Options

4.6. There are no tall buildings or other structures identified in the surrounds that would be suitable to host the proposed equipment.

4.7. Consideration was also given as to whether the existing 20m mast to the west could not be upgraded to facilitate the United Utilities equipment required. United Utilities have no pre-existing agreement with Mobile Network Operators to share sites. Such agreements are wider ranging, strategic agreements, that allow operators to develop networks in tandem. Without such agreements there are significant, often insurmountable, legal barriers to sharing sites between operators without pre-existing agreements. In addition, the United Utilities equipment has specific structural requirements based on the weight loading of antenna. Surveying teams have assessed that it would not be safe to attach United Utilities equipment to the existing 20m mast and it's upgrade has been discounted on this basis.

4.8. Subsequently, the Application Site is considered the most viable since:

- It is located adjacent to an existing commercial area, minimising visual impact compared to more sensitive residential or heritage settings.
- It's close proximity to trees of a comparable height to the 12m mast proposed which will assist in naturally screening the mast from nearby properties and road users.

- The pavement around the Application Site is wide enough to safely accommodate the equipment without prejudicing the movement of pedestrians.

5. Pre-Application Engagement

5.1. In terms of pre-application Engagement, pre-consultation letters were sent to the following key stakeholders on 8 December 2025:

- Manchester City Council Planning Department
- Local Ward Councillors Bridges, Reeves and White
- Old Moat Primary School

5.2. At the time of submission, one response had been received from Councillor White who expressed concern for the location of the proposal being close to the shops and amenities of Withington Town Centre and that the Site was perceived to be adjacent to a conservation area and listed buildings. It was also stated that the mast and cabinets was situated on a busy section of pavement.

5.3. Whilst the Applicant appreciates the response, no changes were made to the proposal following this consultation response on the basis that the Applicant considers an offset of over 150m from designated heritage assets as sufficient to result in no harm to assets and that there is enough space on a pavement (previously described by the LPA as 'wide' in considering application reference 138697/TEL/2023) to preserve pedestrian safety.

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);
- Manchester City Council Core Strategy (July 2012)
- 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.

National Planning Policy Framework

6.4. Section 10 of the NPPF provides support for high quality communications. Paragraph 119 says that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

6.5. Paragraph 120 says that the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.

6.6. Paragraph 122 says that applications for electronic communications development should be supported by the necessary evidence to justify the proposal including the outcome of consultations with organisations with an interest in the proposed development, an ICNIRP certificate and evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure.

Manchester Core Strategy 2012 – 2027

6.7. Policy SP1 relates to Spatial Principles and says development in all parts of the City should make a positive contribution to neighbourhoods of choice including creating well designed

places that enhance or create character and protect and enhance the built and natural environment.

6.8. Policy DM1, Development Management - This policy states that all development should have regard to a number of specific issues, the most relevant of which include:-

- Appropriate siting, layout, scale, form, massing, materials and detail.
- Impact on the surrounding areas in terms of the design, scale and appearance of the proposed development. Development should have regard to the character of the surrounding area.
- Effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation. This could also include proposals which would be sensitive to existing environmental conditions, such as noise.
- Accessibility: buildings and neighbourhoods fully accessible to disabled people, access to new development by sustainable transport modes
- Community safety and crime prevention. o Vehicular access and car parking.
- Effects relating to biodiversity, landscape, archaeological or built heritage.

6.9. Saved UDP Policies - Policy DC17 (Telecommunications) is considered of relevance in this instance: Policy DC17.1 states that applications for telecommunications developments will normally be approved if the Council can be satisfied that the development has been sited and designed to minimise its impact on residential amenity and in environmentally sensitive areas. Wherever possible, the Council will expect the potential of existing buildings and masts, including the sharing of such facilities, to be fully explored before agreeing to additional separate development.

Policy Assessment

6.10. Although the mast is not intended to serve mobile network operators or public mobile communications, it will play a key role in delivering critical digital connectivity infrastructure for United Utilities, a statutory undertaker providing essential services. The infrastructure will support operational communications for utilities management, environmental monitoring, and real-time data transmission, enabling United Utilities to deliver safe, efficient, and sustainable utility 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.

6.11. This type of infrastructure investment directly supports the economic and environmental pillars of sustainable development. By facilitating improved communications across United Utilities operational areas, the mast will enable greater efficiency in utility 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.

6.12. 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 adjacent to light industrial and agricultural uses, 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.

6.13. The development benefits from direct access off Copson Street, 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.

6.14. The mast also supports broader environmental sustainability by enabling United Utilities 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 have been guided by the special technical and operational factors affecting the need to provide a specific digital communication service to the area, having regard to the need to minimise visual impact whilst balancing operational requirements, 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 or other buildings that form the wider urban context. 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 townscape 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 townscape, the mast proposed is a benign structure: it is much lower than other telecommunications masts situated in the townscape surrounds.

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 unauthorized 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 digital communications mast, being comprised of a 12m monopole which will support an Omni Antenna at the top of the mast to a maximum height of 13.45m. Ancillary equipment which is to be installed consists of a GPS Module, Collinear Antenna and one equipment cabinet.

9.2. The digital mast will provide digital communication services for United Utilities 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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