

# **SUPPORTING STATEMENT FOR PRIOR APPROVAL: DEVELOPMENT FOR ELECTRONIC COMMUNICATIONS NETWORK**

**Site reference SW142**

August 2026



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**Project quality assurance information sheet**

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# 1. INTRODUCTION

- 1.1. This statement supports an application made under sub-paragraph (4) and in accordance with sub-paragraph (5) of paragraph A.3 of Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development (GDPO)) (England) Order 2015, as amended. Part 16 for determination as to whether the prior approval of the authority will be required for application made by SUEZ Advanced Solutions UK Ltd (SUEZ) for the development proposed on the corner of Haglands Lane / Nightingales, West Chitlington.
- 1.2. As shown in the submitted drawings, the development is proposing that a 13m telegraph pole is erected with a whip antenna and modem along with a small equipment cabinet.
- 1.3. SUEZ is an Electronic Communications Code Operator as per paragraph A.4 of the GPDO Part 16 and so benefits from the right set out in Paragraph 9 of the Electronic Communications Code to carry out street works. The Electronic Communications Code is found at Schedule 2 of the Telecommunications Act 1984, as amended. SUEZ also benefits from the permitted development rights set out under Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. Hence in this case, the application is made for Part 16 Class A(a) development in accordance with the prior approval procedure set out in A.3.
- 1.4. This statement includes:
  - A written description of the proposed development
  - A description of the site and surrounding area
  - An explanation of how the proposed siting and design of the development accords with National and Local Planning policies
  - A summary of the design and access considerations that have informed the proposed layout of the development.
- 1.5. This statement, including Design and Access considerations, outlines the role and purpose of the proposed development, identifies the particular need that the proposal seeks to address, and demonstrates conformity with relevant planning policy. It further addresses health and safety considerations and related matters to provide additional reassurance.

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## 2. THE APPLICANT

- 2.1. SUEZ Advanced Solutions represents the technological spearhead of the SUEZ Group, a global leader in circular solutions for water and waste management with over 160 years of heritage. Positioned at the core of the group's strategic vision, the Advanced Solutions division leverages a dedicated unit of over 600 data and artificial intelligence experts to accelerate the ecological, operational, and economic performance of its clients.
- 2.2. Operating globally across more than 40 countries, SUEZ is the European leader in smart water metering and a world leader in smart digital water operations and asset management solutions. By harnessing advanced technologies—such as the *On'connect*™ IoT smart metering range, real-time data analytics, and AI—the division helps local authorities, water utilities, and industrial groups optimize resource allocation, drastically reduce non-revenue water and leaks, lower carbon footprints, and streamline waste management processes.
- 2.3. In the United Kingdom, SUEZ applies its global expertise in smart resource management to address critical domestic challenges, including water scarcity, leakage reduction, and net-zero infrastructure targets. The UK operation acts as a key adopter and executor of SUEZ's advanced digital portfolio and serves over 1 million business customers and millions of householders.
- 2.4. SUEZ is committed to core values that guide its operations and business practices. These values include:
- **Sustainability:** SUEZ places a strong emphasis on sustainability, aiming to protect and preserve the environment by promoting recycling, resource recovery, and waste management practices that minimise environmental impact.
  - **Circular Economy:** SUEZ is dedicated to promoting the circular economy model, which focuses on reducing waste, maximising resource efficiency, and promoting the reuse and recycling of materials to create a closed-loop system.
  - **Innovation:** SUEZ values innovation and strives to develop and implement cutting-edge technologies and solutions to address complex waste management challenges, optimise resource recovery, and support sustainable development.
  - **Customer Focus:** SUEZ prioritises understanding and meeting the needs of its customers, working closely with them to deliver tailored and effective waste management and recycling solutions.
  - **Health and Safety:** SUEZ places the highest priority on the health and safety of its employees, customers, and the communities it serves. The company is committed to maintaining safe working conditions and adhering to rigorous safety standards.
  - **Social Responsibility:** SUEZ actively engages with local communities, promoting social responsibility initiatives and contributing to the well-being and development of the areas in which it operates.

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### 3. SMART METER NETWORK

- 3.1. The development proposed forms part of SUEZ's planned smart water metering network for Southern Water. Southern Water supplies clean water and wastewater services to more than four million customers across the South East of England, covering Hampshire, the Isle of Wight, West Sussex, East Sussex, and Kent. Southern Water plans to deliver an industry leading water meter upgrade programme of one million meter replacements over the next 5 years. The water meter upgrade rollout is a cornerstone of Southern Water's efforts to accelerate digital transformation within the water sector. By implementing advanced metering technologies, the programme aims to deliver tangible benefits to customers, the environment, and the overall performance of the water network.
- 3.2. SUEZ plays a central role in the Horizon Water Infrastructure Southern Water Alliance (HWI SWS Alliance), a collaborative partnership delivering a best-in-class metering programme for Southern Water. As a key partner alongside M Group Water, SUEZ brings premier expertise in delivery, technology, and innovation, backed by a proven track record in large-scale infrastructure and water programmes. Together, the Alliance leverages advanced solutions and a strong commitment to innovation to ensure the successful execution of this ambitious water metering rollout.
- 3.3. In summary, the major benefits of smart metering will be:
- Improve customer insight and engagement through enhanced metering technologies: providing clear, detailed information of customer water usage and consumption patterns, enabling them to adjust their behaviours to save water, energy and money;
  - Enhance water efficiency across the clean water network service area: reduced danger of demand outstripping supply;
  - Optimise network performance for greater reliability and efficiency;
  - Support environmental sustainability through data-driven solutions: lower consumption and reduce leakage enable reduced abstraction; this in turn cuts carbon emissions from water treatment and distribution processes.
- 3.4. In order to provide radio coverage for the smart water radio network, electronic communication base equipment running under Ofcom and EU approved WIZE 169MHz radio frequency will need to be deployed across Southern Water supply areas, hence the development proposed in Sussex.

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## 4. DEPLOYMENT REQUIREMENT

- 4.1. SUEZ is licensed by Ofcom, the independent regulator of the UK's communications industries, to use 169MHz spectrum for the development of smart metering networks. The proposed radio station will operate in this frequency, which is the same as that being used in northern England, Scotland, Crown dependencies, and many European countries as part of SUEZ smart metering programme for water utilities.
- 4.2. As the network must be able to communicate with meters that are typically found in a boundary box buried underground, or deeply indoor, the network site must be located so that they can provide an acceptable level of coverage to the properties they serve.
- 4.3. SUEZ work closely with key suppliers in the telecoms industry and operates smart metering networks in different countries. Basing the smart metering radio network on existing shared telecoms sites will be a critical element in minimising the potential visual impact associated with the deployment of new radio station infrastructure. This is also consistent with longstanding statutory and policy requirements to use existing telecommunications sites, tall buildings or other high structures where possible to minimise visual impact as is required by GPDO Part 16 Class A development (ref. A.2(1))
- 4.4. These main installations from existing telecommunication sites provide the main umbrella of coverage to larger geographical areas and premises within those areas. However, there are still smaller settlements, peripheral areas and more remote locations that cannot be adequately served by the main installations due to coverage limitations, often arising from distance, topography or other environmental constraints. To provide reliable, localised coverage in these areas, a secondary layer of smaller sites is required. This application relates to a site that forms part of this secondary coverage layer, as explained in further detail below.

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## 5. SITE SELECTION AND DESIGN CONSIDERATIONS

- 5.1. The streetwork structure or micro sites are required to provide localised coverage over very specific areas and so the sitting parameters for coverage reasons are narrow.
- 5.2. The sites must also satisfy a range of operational criteria, such as good 4G/5G connectivity, an existing power supply which is suitably high and resilient for an electronic communication network, a reasonable level of security and vehicular or pedestrian access for ongoing maintenance. In addition, the site must be capable of being constructed without undue constraints and avoiding undue environmental disturbance that, for example, might be associated with creating new access tracks and supplying new power runs above or below ground.
- 5.3. In assessing these requirements and seeking an appropriate balance between operational and environmental considerations, a sequential approach to site selection has been undertaken. Opportunities for site sharing and the use of existing buildings and structures have been carefully explored to meet the identified operational need while minimising environmental impacts.
- 5.4. The proposed development at the site seeks to ensure the height and mass of the design is sympathetic to its surrounds, having been specified with the narrowest profile and minimum height capable of delivering the required coverage. The proposed siting and design have been specified to maintain and preserve the location's character whilst delivering the level of service needed in this location. It is therefore considered that the proposed development is to accord with the conditions listed in paragraph A.2 of GPDO Sch 2 Part 16.
- 5.5. Our conclusion is that the best balance between environmental and operational considerations is provided by using a specially designed structure at the application site, sufficiently close to the properties that need to be served. This is the reason for the application before you.

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## 6. PROPOSED DEVELOPMENT

- 6.1. The Proposed Development comprises a 13m telegraph pole is erected with a whip antenna and modem along with a small equipment cabinet. The infrastructure is required to support the operation of Southern Water's smart metering network, enabling communication between installed smart water meters and the wider network.
- 6.2. This section provides a proportionate assessment of the design, siting, appearance and access arrangements associated with the Proposed Development.

### **Site and Surrounding Context**

- 6.3. The application site is located on the corner of Haglands Lane / Nightingales, West Chitlington. The location is shown on the location plan submitted with this application. The immediate surrounding area is characterised by primarily residential development.
- 6.4. The proposed installation would be on the corner of Haglands Lane / Nightingales, approximately 20m from the nearest residential development. Existing features within and surrounding the site include a residential dwelling with a boundary hedge, which have been considered when determining the proposed location.
- 6.5. The site is not a site of special scientific interest or within the curtilage of a schedule monument or a listed building

### **Design, Siting and Appearance**

- 6.6. The siting and design of the Proposed Development have been carefully considered having regard to both the technical requirements of Southern Water's smart metering network and the character and appearance of the surrounding area.
- 6.7. The proposed equipment would measure approximately 0.66m wide X 1.13m high X 0.3m depth and would be finished in dark green to assist with the integration with its surroundings. There is also a 13m telegraph pole with modem and whip antenna. The scale of the installation has been kept to the minimum necessary to achieve the required communications coverage and provide an effective and reliable connection to the smart metering network.
- 6.8. The location has been selected to minimise visual prominence as far as reasonably practicable whilst still meeting the operational requirements of the network.
- 6.9. Consideration has also been given to whether existing buildings, masts or other structures could accommodate the necessary equipment. However, for this site it was concluded that a new mast and equipment box would need to be installed.
- 6.10. This approach is consistent with Policy CO1 of the National Planning Policy Framework, which requires telecommunications infrastructure to be sited and designed to minimise visual impacts while recognising its operational requirements.

### **Access**

- 6.11. Access to the Proposed Development will principally be required during installation and thereafter only periodically for inspection, maintenance and repair by an engineer using a light vehicle that will be parked lawfully nearby.
- 6.12. Access will be obtained via Haglands Lane. Given the limited scale of the development and infrequent maintenance requirements, the proposal would not result in any material change to existing pedestrian or vehicular access arrangements.

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## **Conclusion**

- 6.13. The Proposed Development represents a small scale and functional item of telecommunications infrastructure required to support Southern Water's smart metering network. Its siting, scale and appearance have been carefully considered to minimise visual effects while meeting the technical and operational requirements of the network.
- 6.14. Subject to the details identified above, the development is considered to represent an appropriate and proportionate design response to its location and would not result in any significant adverse effects in respect of design, access or local amenity.

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## 7. PLANNING POLICY CONSIDERATIONS

- 7.1. This section undertakes an appraisal of the Proposed Development in the context of the current and emerging planning policy framework at both a local and national level.
- 7.2. As this Proposed Development constitutes Permitted Development, it does not have to align with the development plan however, we have still provided an overview of where the proposal sits in line with local and national policies.

### National Planning Policy Framework

- 7.3. The latest edition of the National Planning Policy Framework (NPPF) was adopted in August 2026 and sets out the Government's planning policies for England and how these are expected to be applied.
- 7.4. The NPPF has a key focus of sustainable development. It states, "*the purpose of the planning system is to contribute to the achievement of sustainable development, by managing the use and development of land in the long-term public interest.*"
- 7.5. The NPPF sets out the governments planning policies for England and provides the overall framework for planning policy in England and is a material consideration in the determination of planning applications.
- 7.6. In paragraph 17 it goes on to say the planning system has three interdependent objectives to help achieve sustainable development. These are an economic role, a social role and an environmental role.
- 7.7. The objective of the policies in Section 7 is to enable businesses to invest, expand and adapt in a way that reflects the opportunities, challenges and characteristics of different areas, and supports long term economic growth both locally and nationally. This application is supporting this objective through the investment and delivery of communications infrastructure.
- 7.8. Policy S3 sets out that decisions should apply a presumption in favour of sustainable development. This application would also follow Policy S4 as it is within a settlement which "*should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects*" which it is not believed there are.
- 7.9. Section 9 of the NPPF is about supporting high quality communications. The main objective is to support the expansion and upgrading of telecommunications infrastructure.
- 7.10. Policy CO1 states substantial weight should be given to the benefits of improving telecommunications network coverage, capacity, reliability and resilience.
- 7.11. The Proposed Development is small in scale, appropriately sited and sensitively designed, having regard to its operational requirements. In accordance with the national decision making policies of the NPPF, the proposal would support the provision of essential communications infrastructure whilst minimising any potential adverse impacts.
- 7.12. The benefits of the Proposed Development are therefore considered to outweigh any limited effects arising from it, and the proposal should be considered acceptable in principle.

### LOCAL POLICY

- 7.13. The Horsham District Planning Framework (HDPF) is the local plan which covers the proposed location of this site. There are a number of policies within the HDPF that are relevant to this application.

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- 7.14. Policy 3 identifies Horsham as the principal settlement within the district and confirms that development will generally be permitted within defined built up areas where it is appropriate in nature and scale and maintains the characteristics and function of the settlement.
  - 7.15. Although the proposed pole would be taller than typical street furniture, telecommunications equipment is a recognised component of modern urban infrastructure. Furthermore, the proposed development is small in scale and will provide a more efficient service for residents.
  - 7.16. Policy 7 of the HDPF relates to Economic Growth and provides direct support for the provision of appropriate information and communications technology infrastructure. This proposed development will allow residents to monitor water use and make more sustainable choices.
  - 7.17. Policy 32 requires development to demonstrate a clear understanding of its physical, social, environmental and policy context. Development should be attractive, functional, accessible and safe, complement locally distinctive character and integrate appropriately with its surroundings.
  - 7.18. The proposed pole and cabinet are functional items of infrastructure and their design is necessarily influenced by operational requirements. The cabinet will be positioned so that it does not dominate the footway or create an incongruous feature within the street scene. The finish will be dark green to assist with the integration with its surroundings.
  - 7.19. Policy 33 requires development to avoid unacceptable harm to neighbouring amenity and to ensure that its scale, appearance and design relate sympathetically to the surrounding built environment, landscape, open spaces and routes.
  - 7.20. Although the proposed development would introduce a new vertical feature into the street scene, the height is operationally necessary. It is not believed that the pole would cause any harm to the wider character of the area or to any important views.
  - 7.21. The site has been carefully selected in a position capable of providing the required Southern Water SMN coverage whilst being situated away from the views of residential properties.

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## 8. SUMMARY AND CONCLUSION

- 8.1. The proposed development forms part of SUEZ' planned smart water metering network for Southern Water in Sussex North Water Resource Zone.
- 8.2. Smart water meter data will give Southern Water a much more accurate picture of real-time consumption and the proposed development will significantly improve data visibility across the network. This enhanced insight supports stronger network management and resilience planning, helping ensure that future demand does not exceed available supply.
- 8.3. For consumers, smart meters provide the ability to monitor and reduce personal water use, which can lead to lower bills. More broadly, smart water metering is expected to play a key role in supporting government ambitions for a more sustainable, resource-efficient economy and society.
- 8.4. The proposed use of the application site achieves an appropriate balance between operational requirements and environmental considerations. Its location enables the necessary level of coverage for the properties it is intended to serve, while the use of a slimline, innovatively designed structure ensures it will read as a piece of typical street furniture within the wider streetscape. As a result, the location, design and appearance of the installation should be considered acceptable.
- 8.5. The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines. Ofcom UK has authorised this non-ironing radio band for smart city use.
- 8.6. This statement has demonstrated that the proposal is in accordance with the requirements and conditions of Part 16 Class A development and therefore constitutes Permitted Development under the GPDO. It is a form of development that is specifically encouraged as a matter of principle is Permitted Development, and in its detail complies with the policy objective of minimising potential environmental impact.
- 8.7. In conclusion, SUEZ are seeking written notice as to whether prior approval is required and if so, is it granted.