



WOKINGHAM BOROUGH COUNCIL

Statement by Local Planning Authority

Appellant:	Mohammed Gumel, Airwave Solutions Ltd.
Site:	West Court Land, Park Lane, Finchampstead, Wokingham, RG40 4QF
Local Planning Authority Reference:	252762
Planning Inspectorate Reference:	APP/X0360/W/26/6011060

Contents

1.	Introduction	(Pg. 3)
2.	Site context	(Pg. 4)
3.	Relevant planning history	(Pg. 6)
4.	Relevant policy context	(Pg. 6)
5.	Summary of the Council's position and principal weaknesses in the appeal case	(Pg. 6)
6.	Reason for refusal 1 - Landscape character, visual impact and trees	(Pg. 10)
7.	Reason for refusal 2 – Harm to SANG functionality and SPA mitigation	(Pg. 12)
8.	Reason for Refusal 3 – Highway Safety	(Pg. 14)
9.	Reason for refusal 4 – Alternative sites	(Pg. 15)
10.	Positive engagement and future solutions	(Pg. 18)
11.	Conclusion	(Pg. 19)

List of appendices

Appendix 1: Officer Report (252762)

Appendix 2: LPA E-mail to applicant clarifying reasons for refusal (252762)

Appendix 3: WBC Green Infrastructure officer comments on appeal

Appendix 4: WBC Highways officer comments on appeal

Appendix 5: SDL Manager (Nick Chancellor) comments on appeal

Appendix 6: Natural England SANG Guidelines

Appendix 7: Natural England advice to LPAs

Appendix 8: PINS appeal decision: Vauxhall Drive, Woodley, Wokingham
(APP/X0360/W/21/3285240)

Appendix 9: PINS appeal decision: Broadwater Lane, Hurst, Wokingham
(APP/X0360/W/21/3279867)

Appendix 10: PINS appeal decision: Broadwater Lane, Hurst, Wokingham
(APP/X0360/W/22/3311026)

Appendix 11: PINS appeal decision: Mill Lane, Earley, Wokingham
(APP/X0360/W/22/ 3295259)

Appendix 12: PINS appeal decision: Grass verge, Wokingham Road
(APP/X0360/W/22/ 3310570)

Appendix 13: WBC Senior Landscape Officer memo (application 252762)

1 Introduction

- 1.1 This Statement of Case is submitted on behalf of Wokingham Borough Council (WBC) in response to an appeal made by Airwave Solutions Ltd. against the Council's refusal of Prior Approval Application 252762 under Part 16 of The Town and Country Planning (General Permitted Development) (England) Order 2015 for the installation of replacement electronic communications apparatus at West Court Land, Park Lane, Finchampstead.
- 1.2 The appeal relates to a proposed 29.1m high slimline lattice mast together with antennas, transmission dishes, GPS aerial, equipment housing and associated ancillary development (refer to Fig. 1 below). The proposal is intended to replace an existing Airwave installation at Church Farm/Rectory Farm (TVY048) which the appellant advises may need to be vacated in the future.

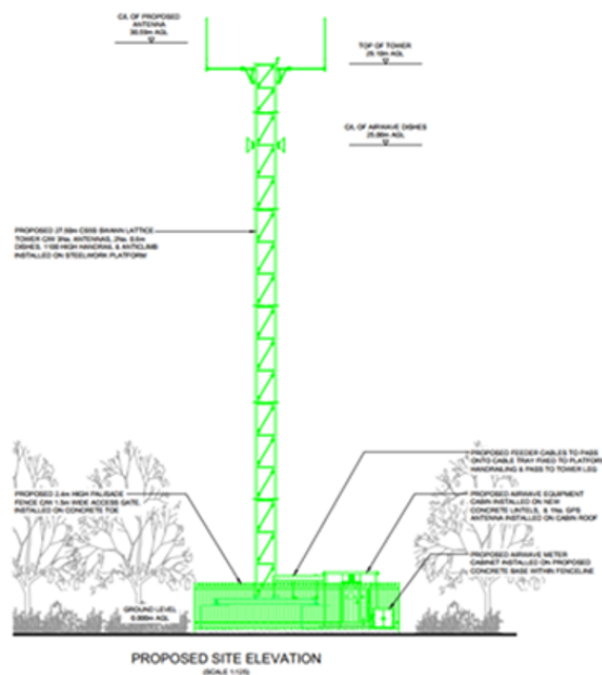


Fig. 1.0: Extract of proposed site elevation (drawing no. TVY181-DD-03)

- 1.3 The Council fully recognises the importance of reliable communications infrastructure, particularly where it supports emergency services and public safety. The Council has never disputed the operational need for a replacement solution or the public benefits associated with maintaining resilient emergency services communications coverage within the Borough. Indeed, during consideration of the application, officers expressly indicated a willingness to engage positively with the appellant regarding alternative sites and encouraged further pre-application discussions if the appellant wished to explore alternatives.

- 1.4 Accordingly, the Council's objection is not to the principle of replacement telecommunications infrastructure. Rather, the Council objects to the siting and appearance of the proposed development within this particular location and considers that the appellant has failed to demonstrate that the significant harms identified are unavoidable or that less harmful alternatives do not exist.

2 Site context

- 2.1 The appeal site lies within West Court Suitable Alternative Natural Greenspace ("SANG") located immediately west of Arborfield Green and Finchwood Park.
- 2.2 West Court SANG forms part of the Arborfield Garrison Strategic Development Location and was secured as part of the avoidance and mitigation strategy necessary to enable approximately 2,000 dwellings to be delivered without adversely affecting the integrity of the Thames Basin Heaths Special Protection Area ("SPA"). The SANG therefore serves a specific ecological mitigation function rather than simply providing recreational open space.
- 2.3 SANGs are intended to provide attractive alternative recreational space that diverts recreational pressure away from the SPA. Their effectiveness depends upon maintaining an attractive, naturalistic and semi-natural visitor experience that encourages users to choose the SANG rather than visit internationally protected heathland habitats.
- 2.4 Prior Approval Application 252762 was submitted on 11 November 2025. The application was duly considered by the Council (refer to the officer report provided at Appendix 1) but refused on 11 December 2025 on the following grounds:
 1. By virtue of its excessive height, utilitarian design and inappropriate siting within the West Court Suitable Alternative Natural Greenspace (SANG), the proposal would introduce a highly prominent and urbanizing feature that would be starkly at odds with the naturalistic character of the SANG and the wider countryside. The proposal would erode the wooded and heathland qualities that define this landscape and fails to demonstrate that it would not have a detrimental impact on existing trees, the removal of which would further degrade the quality and integrity of the area. Accordingly, the proposal is contrary to Core Strategy Policies CP3 and CP11, MDD Local Plan Policies CC03 and TB21, and guidance contained within the

Borough Design Guide SPD, Arborfield Garrison SDL SPD, and the Finchampstead Neighbourhood Development Plan.

2. By virtue of its inappropriate siting within the West Court Suitable Alternative Natural Greenspace (SANG), the proposal's physical and visual intrusion would materially reduce the attractiveness of the SANG for recreational use, thereby undermining its effectiveness as mitigation for the Thames Basin Heaths Special Protection Area (SPA), contrary to Core Strategy Policy CP8, saved South East Plan Policy NRM6, Local Plan Policy TB21, and Natural England's SANG guidelines. As the SPA was designated under the European Birds Directive, the failure to maintain the SANG's functionality as an alternative to SPA recreation conflicts with the requirements of that Directive and the agreed SPA Mitigation Strategy.
 3. The proposal fails to demonstrate that adequate details have been provided regarding construction access arrangements, delivery methodology, and vehicle manoeuvring. In particular, no swept path analysis has been submitted to confirm that the largest delivery vehicle can enter and leave the site in forward gear, nor has sufficient information been provided on visibility splays or compliance with the width restriction along the site frontage. As such, the application does not demonstrate that the development can be carried out without detriment to highway safety, contrary to the requirements of Part 16 of the GPDO and Core Strategy policy CP6.
 4. The application fails to robustly demonstrate that alternative sites, which could accommodate a new base station and result in less harm to visual amenity, are not feasible. In the absence of such evidence, the proposal is considered contrary to the guidance contained within the National Planning Policy Framework (NPPF), which seeks to ensure that the need for new telecommunications equipment is balanced against the impact on the character and appearance of the area.
- 2.5 Following issue of the decision notice, an administrative formatting issue affecting the numbering of the refusal reasons was immediately clarified in writing with the appellant's agent (refer to Appendix 2) and are provided in correct form above. The substance of the Council's concerns remained unchanged throughout the determination process and the appellant was fully aware of the Council's position before and after determination.

3 Relevant planning history

- 3.1 The relevant planning history is outlined within the original officer's report which has already been forwarded to PINS.

4 Relevant policy context

- Town and Country Planning (General Permitted Development) Order
4.1 The Council recognises that this is a prior approval appeal under Part 16 of the GPDO (2015) and that the principal issues are the siting and appearance of the development. The Council's concerns all relate directly to those matters.

Relevant Development Plan policies and national/local planning guidance

- Core Strategy Policy CP3 (General Principles for Development);
- Core Strategy Policy CP6 (Managing Travel Demand);
- Core Strategy Policy CP8 (Thames Basin Heaths SPA);
- Core Strategy Policy CP11 (Proposals Outside Development Limits (including Countryside);
- MDD Policy CC03 (Green Infrastructure, Trees and Landscaping);
- MDD Policy TB21 (Landscape Character);
- Saved South East Plan Policy NRM6;
- Arborfield Garrison SDL SPD;
- Borough Design Guide SPD;
- Finchampstead Neighbourhood Development Plan;
- National Planning Policy Framework ("NPPF");
- Natural England's Guidelines for Creation of Suitable Alternative Natural Greenspace (2021); and
- Natural England's Thames Basin Heaths SPA Strategic Solution Advice to Local Planning Authorities (2025).

5 Summary of the Council's position and principal weaknesses in the appeal case

- 5.1 The Council considers that the appeal suffers from a number of fundamental weaknesses which remain unresolved. These are outlined in detail below:

The Appeal Mischaracterises the Role of West Court SANG

- 5.2 A recurring theme throughout the appeal statement is the treatment of West Court SANG as though it were simply an area of public open space. In the Council's view, this fundamentally understates the importance and sensitivity of the site.
- 5.3 West Court SANG was specifically secured as part of the mitigation strategy required to support approximately 2,000 dwellings associated with the Arborfield Garrison Strategic Development Location and forms part of the agreed avoidance measures protecting the Thames Basin Heaths Special Protection Area. The attractiveness, landscape character and visitor experience of the SANG are therefore integral to its intended function.
- 5.4 The Council also places significant weight upon the evidence provided by its Strategic Development Locations (SDL) Development Delivery Manager, Nick Chancellor (refer to Appendix 5). Mr Chancellor has been closely involved in the planning, delivery and implementation of the Arborfield Garrison Strategic Development Location, including the securing and subsequent delivery of West Court SANG as part of the approved SPA mitigation strategy. He is therefore uniquely placed to comment on the intended role, character and function of the SANG and whether the appeal proposal is compatible with those objectives. Mr Chancellor's evidence confirms that the appeal statement largely approaches the proposal as a conventional telecommunications development and fails to properly engage with the more fundamental issue of whether a substantial piece of telecommunications infrastructure is appropriately located within land specifically secured to function as SPA mitigation.
- 5.5 Accordingly, this appeal is materially different from a conventional dispute regarding the visual impact of telecommunications infrastructure within general open space.

The Appeal Addresses Visitor Numbers Rather Than SANG Effectiveness

- 5.6 The appellant repeatedly contends that there is no evidence that telecommunications masts result in visitors abandoning recreational sites. However, the Council considers that this does not address the principal issue in dispute.
- 5.7 The relevant question is not whether people would continue to visit the SANG following installation of the mast. Rather, the issue is whether the proposal would erode those characteristics that make the SANG an

attractive alternative to the SPA and consequently diminish confidence in its continued effectiveness as strategic mitigation.

- 5.8 Natural England's guidance (refer to Appendices 6 and 7) is clear that SANGs should maintain a semi-natural character with little intrusion from artificial infrastructure and that there must be certainty that mitigation remains effective for the lifetime of the development it serves. The appeal submissions do not satisfactorily address this issue.

The Appeal Underestimates the Sensitivity of the Site

- 5.9 The Council notes that the appeal statement places significant emphasis upon examples of telecommunications infrastructure in other landscapes and protected areas. However, the appeal fails to engage with the unique circumstances of this site.

- 5.10 In particular, the Council considers that the current proposal raises concerns that are comparable to those identified by Inspectors in previous Wokingham telecommunications appeals involving important public open spaces, recreational environments and visually sensitive landscapes, including:

- Vauxhall Drive - APP/X0360/W/21/3285240 (refer to Appendix 8)
- Broadwater Lane - APP/X0360/W/21/3279867 and APP/X0360/W/22/3311026 (refer to Appendices 9 and 10 respectively)
- Mill Lane - APP/X0360/W/22/3295259 (refer to Appendix 11); and
- Grass verge, Wokingham Road - APP/X0360/W/22/3310570 (refer to Appendix 12).

- 5.11 However, importantly, the Council considers that the present appeal involves a materially higher degree of sensitivity because West Court SANG is relied upon as a strategic ecological mitigation asset rather than merely functioning as recreational open space.

Alternative Site Assessment Remains Inadequate

- 5.12 The Council considers that one of the most significant weaknesses in the appeal is the continued absence of a robust alternative-sites analysis. Whilst the appellant provides narrative explanations for the rejection of a number of alternative locations, the appeal submissions do not contain the comparative technical evidence that would normally be expected to support such conclusions.

5.13 Given that this proposal is intended to replace an existing emergency services installation, the Council would reasonably expect an alternatives assessment to include:

- Existing network coverage plots associated with the current installation.
- Forecast coverage plots showing the anticipated position following removal of the existing installation.
- Coverage plots for the appeal proposal.
- Comparative coverage plots for each of the principal alternative locations considered.
- Technical analysis demonstrating why any alternative location would fail to meet operational requirements.

5.14 The absence of this information prevents the Council and the Inspector from properly understanding whether other potentially less harmful solutions may exist.

Insufficient Evidence Has Been Provided Regarding Trees and Screening

5.15 The appeal continues to rely heavily on existing vegetation to justify the siting of the mast and reduce its perceived visual impact. However, no arboricultural assessment has been submitted demonstrating:

- likely tree losses;
- effects upon protected trees;
- impacts arising from construction activity; or
- the long-term effectiveness of proposed screening.

5.16 The Council considers this to be particularly significant given that previous telecommunications appeals within Wokingham Borough (refer to appendices 8 to 12) have highlighted the importance of robust evidence where trees play a key role in mitigating visual impacts. Relevant sections of these previous appeals are referred to in the Council's analysis below.

Summary of the appeal weaknesses

5.17 In summary, the Council considers that the principal weaknesses in the appeal are:

- Failure to properly recognise the strategic mitigation role of West Court SANG.
- Failure to demonstrate that the proposal would preserve the effectiveness of the SANG as SPA mitigation.

- Underestimation of the landscape, visual and recreational sensitivity of the site.
- Continued absence of robust arboricultural evidence.
- Failure to provide sufficient technical evidence to support rejection of alternative sites, including the absence of comparative coverage modelling.
- Failure to demonstrate that the significant harm identified can only be avoided through use of this particular location.

5.18 For those reasons, and as set out in greater detail under each Reason for Refusal below, the Council respectfully submits that the appeal should be dismissed.

6 Reason for refusal 1 – Landscape character, visual impact and trees

- 6.1 The Council remains firmly of the view that the siting and appearance of the proposal would cause significant harm to the landscape character and visual amenity of both West Court SANG and the surrounding countryside.
- 6.2 The proposal would introduce a 29.1m high lattice mast together with associated fencing, equipment housing, operational compounds and hardstanding within a landscape specifically designed to function as a semi-natural recreational environment. These structures would be overtly engineered, urban and utilitarian in appearance and would contrast sharply with the existing character of the site.
- 6.3 The appellant places considerable reliance upon the existing tree belt as visual mitigation. However, no arboricultural assessment has been submitted demonstrating the extent of likely tree impacts, the long-term retention of screening vegetation or the implications of construction activities within the protected woodland belt. As such, the Council's Senior Landscape Officer (Catherine Brimble) has advised that they have no further comments to make in addition to the objection they made as part of the original application (refer to Appendix 13).
- 6.4 The Council therefore remains unable to conclude that the proposal would avoid adverse impacts on protected trees.

- 6.5 In addition, the Green Infrastructure Officer (Finlay Rothery), who is experienced in the management of SANGs within Wokingham Borough, has commented that the appellant's visual assessment relies upon selective viewpoints which understates the prominence of the development and fail to adequately assess views from the principal circular walking route passing immediately adjacent to the site (refer to Appendix 3).
- 6.6 Specifically, Mr. Rothery comments that:
- “The appellant proposes to introduce artificial infrastructure to the SANG. The proposed structure is large in footprint, significantly taller than the surrounding trees, and would be visible from the majority of the SANG footpaths. There is a footpath, which is part of the required circular walk through the SANG (deemed a vital feature for effective SANG function) that passes extremely close to the proposal site. This section of the circular walk would be severely impacted visually, not only by the mast but by the intrusive base structure. The proposed location would also involve the removal of TPO trees which currently screen the SANG from views of the road”; and that:*
- “Importantly, the housing development [i.e. Arborfield Garrison SDL] exists outside of the SANG boundary, and includes a landscaping buffer and large stand-off distance to the nearest house, while the appellant’s proposal is to site the mast within the SANG boundary, and involves the removal of ecological features (hedgerow and TPO trees) considered to be part of the SANG’s landscape character.”*
- 6.7 Finally, Mr. Rothery also states that the visual effects of the fencing, compound and operational infrastructure have also been understated by the appellant.
- 6.8 Taken together, the evidence of Mr Rothery demonstrates that the proposal would not simply add another vertical structure to the landscape. Rather, it would partly replace existing woodland screening and semi-natural landscape features with a prominent and overtly urban form of development that would materially alter the character of West Court SANG and its surrounding countryside setting. Additionally, no additional information has been provided by the appellant to demonstrate the extent of likely tree impacts resulting from the development.

- 6.9 The Council therefore reaffirms its position that the proposal conflicts with Core Strategy Policies CP3 and CP11, MDD Policies CC03 and TB21, and the landscape objectives embedded within the Arborfield Garrison SDL SPD and Finchampstead Neighbourhood Development Plan.

7 Reason for refusal 2 – Harm to SANG functionality and SPA mitigation

- 7.1 The Council considers this to be the principal issue in the appeal. West Court SANG was created specifically to mitigate the recreational effects of strategic housing growth on the Thames Basin Heaths SPA. It is therefore not ordinary public open space. It is an integral component of the agreed SPA avoidance strategy and forms part of the mitigation package relied upon to satisfy the requirements of Core Strategy Policy CP8, Saved South East Plan Policy NRM6 and the wider Habitats Regulations framework.

- 7.2 The appellant's case largely treats the site as ordinary open space and focuses on whether a telecommunications mast may be visually acceptable in a recreational setting. The Council considers that approach fundamentally misunderstands the purpose of the SANG. Natural England's guidance (refer to appendices 6 and 7) makes clear that:

- SANG effectiveness depends upon attractiveness;
- SANGs should provide a semi-natural experience;
- urban influences are generally not what visitors seek;
- little intrusion from artificial infrastructure is expected; and
- there must be certainty that the SANG remains effective mitigation throughout its operational lifetime.

- 7.3 Specifically, Natural England's Guidelines for the Creation of Suitable Alternative Natural Greenspace - August 2021 (refer to Appendix 6), as cited by the Council's Green Infrastructure Officer, states that:

"Little or no artificial infrastructure is found within the SPA at present apart from the provision of some surfaced tracks and car parks. Generally, an urban influence is not what people are looking for when they visit the SPA and some people

undoubtedly visit the SPA because it has a naturalness about it that would be marred by such features."

- 7.4 The Council also relies upon the evidence of its Strategic Development Locations Development Delivery Manager, Nick Chancellor (refer to Appendix 5). Mr Chancellor was directly involved in the delivery of the Arborfield Garrison Strategic Development Location and the associated mitigation strategy that secured West Court SANG. His evidence is particularly important because it is informed not only by the current condition of the site but also by an understanding of the original planning rationale behind the creation of the SANG and the role it performs within the wider SPA mitigation framework.
- 7.5 Mr Chancellor notes that the appeal statement focuses primarily upon whether a telecommunications mast can be visually accommodated or screened within the landscape. In his view, this approach does not address the principal issue, namely whether land that was deliberately secured and designed to provide a naturalistic recreational environment as mitigation for the Thames Basin Heaths SPA is an appropriate location for such infrastructure in the first place. He concludes that the appeal fails to adequately engage with the distinction between ordinary public open space and a SANG whose effectiveness depends upon maintaining its attractiveness as an alternative recreational destination.
- 7.6 The Council agrees with this assessment. The significance of the appeal site does not arise solely from its landscape quality but from the fact that the landscape character of the SANG is itself part of the mitigation strategy relied upon to protect the SPA. Consequently, any development that introduces conspicuous urbanising features into that environment must be assessed not only in terms of visual impact but also in terms of its implications for the continued effectiveness of the mitigation strategy.
- 7.7 The appellant argues that there is no evidence that visitor numbers to SANGs decline when telecommunications masts are introduced. However, that is not the relevant test.
- 7.8 The question is whether the introduction of a highly prominent telecommunications installation, including fencing, equipment compounds and associated infrastructure, would erode the naturalistic qualities that make West Court SANG an attractive alternative to the SPA. The Council considers that it plainly would.
- 7.9 In this regard, the Council draws attention to previous telecommunications appeal decisions within the Borough, particularly

Vauxhall Drive (Application Ref 210668), where the Inspector attached significant weight to the impact of telecommunications development on the recreational experience and character of an important area of open space.

7.10 However, the present appeal is materially more impactful than the Vauxhall Drive scheme because the attractiveness of West Court SANG is not simply a visual amenity issue. The landscape character and visitor experience of the SANG are fundamental components of its intended mitigation function. Any erosion of those characteristics has implications not only for visual amenity but also for the continued effectiveness of a mitigation measure relied upon to protect an internationally designated ecological site.

7.11 The Council therefore reaffirms its position that the proposal is in direct conflict with:

- Core Strategy Policy CP8;
- Saved South East Plan Policy NRM6;
- MDD Policy TB21;
- Natural England's Guidelines for Creation of SANG (2021); and
- Natural England's Thames Basin Heaths Strategic Solution Advice (2025).

8 Reason for Refusal 3 – Highway Safety

8.1 The Council continues to rely upon the evidence submitted by the Local Highway Authority in respect of this reason for refusal (refer to Appendix 4).

8.2 Whilst the proposal would generate limited operational traffic following installation, insufficient information has been provided regarding construction access arrangements, delivery methodology or vehicle manoeuvring. The appellant has not submitted:

- swept path analysis;
- evidence demonstrating sufficient turning facilities;
- adequate visibility information; or
- detailed construction access arrangements.

- 8.3 These deficiencies remain despite concerns being raised during determination of the application and continue to prevent the Council from concluding that the proposal can be safely implemented.
- 8.4 Accordingly, the proposal remains contrary to Core Strategy Policy CP6 and the requirements of Part 16 GPDO.

9 Reason for refusal 4 – Alternative sites

- 9.1 The Council fully recognises the importance of maintaining emergency services communications coverage and accepts that substantial weight should be attached to this consideration. However, the existence of a potential need for replacement infrastructure does not automatically justify development within this particular location.
- 9.2 The Council's concern that alternative sites have not been reasonably explored was outlined in detail within the officer report at application stage, particularly at pages 14-17 (refer to Appendix 1). The appellant's response for this appeal indicates that alternative sites were examined and discounted for technical, landownership, operational, coverage, visual amenity or deliverability reasons, and that the appeal site therefore represents the only currently deliverable solution capable of maintaining the required coverage. However, no additional compelling information has been provided for this appeal to demonstrate these claims.
- 9.3 The appellant further claims that there is no requirement to identify the "best" site and contends that the alternative site at Hogwood Industrial Estate, as identified by the Council as a possible alternative (see Pg. 16 in the officer report provided at Appendix 1), would not meet operational requirements whilst delivering the same level of network performance.
- 9.4 However, the Council maintains that a reasonable assessment of potential alternative sites should extend to comparative technical evidence (e.g. coverage plots) to assess the potential of alternative sites, including:
- existing coverage from the current installation;
 - predicted coverage following removal of the existing installation;
 - predicted coverage from the appeal proposal; and
 - predicted coverage from each alternative site considered.

- 9.5 Whilst the appellant has provided some coverage material relating to the existing and appeal scenarios, the Council's concern is that no meaningful comparative coverage modelling has been provided for the principal alternative locations considered. In particular, the appellant has not provided equivalent coverage plots for each alternative site, nor a clear technical comparison demonstrating why those alternatives could not provide an operationally acceptable, less harmful solution.
- 9.6 The appellant also states that it is *"currently working towards a different solution however this requires planning consent and landlord agreement"*. The Council affords this assertion little weight. The existence of potential operational, commercial or landownership constraints associated with another site does not alter the requirement for the appeal proposal to be assessed on its own planning merits, having regard to its siting and appearance. Each proposal must be considered against the relevant planning policies and material considerations applicable to that particular site. The possibility that an alternative scheme may prove more complex, may require planning permission, or may not ultimately secure landowner agreement is not justification for permitting development that would otherwise result in unacceptable planning harm.
- 9.7 Rather than supporting the appellant's case, this statement reinforces the Council's concern that alternative solutions have not been robustly assessed or adequately presented to either the Council or the Inspector.
- 9.8 Furthermore, the Council does not accept that the planning process should effectively be circumvented because another solution may be subject to planning control or may require additional negotiations with third parties. Such matters are routinely encountered in the delivery of development and telecommunications infrastructure and do not diminish the need to properly assess the environmental consequences of the appeal proposal. To conclude otherwise would risk elevating private landownership and operational considerations above the planning merits of the development itself.

Recent appeal cases

- 9.9 The Council remains concerned that the appellant has failed to reasonably demonstrate that less harmful site alternatives are unavailable to facilitate a new mast elsewhere to provide the required coverage. This particular issue has featured prominently in a number of previous telecommunications appeals within Wokingham Borough including:

- Vauxhall Drive appeal - APP/X0360/W/21/3285240 (refer to Appendix 8)
- Broadwater Lane appeals - APP/X0360/W/21/3279867 and APP/X0360/W/22/3311026 (refer to Appendices 9 and 10 respectively)
- Mill Lane appeal - APP/X0360/W/22/3295259 (refer to Appendix 11); and
- Grass verge, Wokingham Road - APP/X0360/W/22/3310570 (refer to Appendix 12).

9.10 Across the above appeals, Inspectors repeatedly examined the adequacy of alternative-site assessments where they formed reasons for refusal:

- Vauxhall Drive (APP/X0360/W/21/3285240) – Here, Para. 10 of the Inspector’s report highlights that an alternative site put forth by the Council had not been considered and therefore that less harmful alternatives had not properly been explored. The appeal was dismissed.
- Broadwater Lane (APP/X0360/W/21/3279867) – Para. 6 highlights that the Inspector was not satisfied that alternatives have been adequately addressed including why a potential alternative site had been discounted ‘due to underground services’. The appeal was dismissed.
- Broadwater Lane (APP/X0360/W/22/3311026) – Paras. 8 to 10 highlight the Inspector’s concerns that the alternative sites discounted by the appellant for reasons such as proximity to residential dwellings, Listed Buildings, overhead cables and tree canopy had not been adequately addressed. The appeal was dismissed.
- Mill Lane (APP/X0360/W/22/3295259) – Paras. 14 to 17 highlight the Inspector’s concerns that the alternative sites discounted by the appellant for reasons such as underground services, overhead cables and insufficient pavements widths had not been adequately explored. The appeal was dismissed.
- Grass verge, Wokingham Road (APP/X0360/W/22/3310570) – Paras. 12 to 16 highlight the Inspector’s concerns that the alternative sites such as buildings, other structures, mast sharing had not been adequately explored. The appeal was dismissed.

9.11 As outlined above, the appellant has not supplied information or reasoning to discount other potential alternative sites. Instead, alternatives are largely dismissed through narrative explanation rather

than comparative technical analysis. Consequently, neither the Council nor the Inspector can meaningfully evaluate whether less harmful alternatives may exist.

- 9.12 The Council therefore remains unconvinced that the appeal site represents the least harmful available option nor that other alternative sites and design solutions have been reasonably explored.

10 Positive engagement and future solutions

- 10.1 Throughout its consideration of the application, the Council sought to engage constructively with the appellant.
- 10.2 Officers expressly indicated that the Council would be willing to discuss alternative sites and encouraged further pre-application engagement should the appellant wish to explore alternatives. The Council remains willing in principle to support the identification of an alternative solution capable of providing the necessary emergency services coverage whilst avoiding the significant harms identified in this appeal.
- 10.3 The appellant nevertheless elected to pursue the present appeal rather than undertake further discussions regarding alternative locations. Whilst this is entirely their prerogative, it does not overcome the significant shortcomings identified in the assessment of alternatives or demonstrate that the current site is the only workable solution.
- 10.4 The Council wishes to make clear that it supports, in principle, the provision of replacement telecommunications infrastructure necessary to maintain emergency services communications coverage.
- 10.5 The Council has consistently acknowledged the importance of the Airwave network and the significant weight that should be afforded to ensuring continued communication capability for police, ambulance and fire services.
- 10.6 Importantly, officers expressly advised the appellant during consideration of the application that the Council would be willing to engage through the pre-application process regarding possible alternative sites should the applicant wish to pursue that option. The Council remains willing to engage positively in identifying a suitable alternative location within the Borough.

- 10.7 The appellant elected not to pursue this route and instead proceeded directly to appeal. Whilst that choice is entirely a matter for the appellant, the Council does not consider that the appeal evidence demonstrates that the current site is the only available solution or that the substantial harms identified are unavoidable.

11 Conclusion

- 11.1 The Council accepts the importance of emergency services communications infrastructure and fully acknowledges the public benefits associated with maintaining network resilience.
- 11.2 However, this appeal is not concerned with whether replacement infrastructure is required. The principal issue is whether the proposed siting and appearance of that infrastructure within West Court SANG is acceptable.
- 11.3 The Council considers that:
- the proposal would cause significant harm to landscape character and visual amenity;
 - the proposal would materially undermine the attractiveness and effectiveness of West Court SANG as SPA mitigation;
 - insufficient information has been provided to demonstrate safe implementation from a highway perspective; and
 - the appellant has failed to robustly demonstrate that less harmful alternative sites are unavailable.
- 11.4 Taken together, these matters provide clear and compelling justification for dismissing the appeal as neither of the four reasons for refusal that were issued on application 252762 have been addressed by the appellant.
- 11.5 Accordingly, Wokingham Borough Council respectfully requests that the Inspector dismiss the appeal.