

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	252762
Site Address:	West Court Land, Park Lane, Finchampstead, Wokingham, RG40 4QF
Expiry Date:	6 January 2026
Site Visit Date:	18 November 2025
Proposal: Prior approval submission for a proposed installation of electronic communications apparatus comprising a 29.1m high slimline lattice mobile phone mast, 3 no. aerials, 2 no. transmission dishes, 1 no. GPS aerial, radio equipment housing and development ancillary to radio equipment housing.	

PLANNING LEGISLATION

The Town and Country Planning (General Permitted Development) (England) Order 2015

Article 3	In conjunction with Schedule 2, Part 16, Class A grants planning permission for electronic communications code operators for the installation, alteration or replacement of any electronic communications apparatus and development ancillary to radio equipment housing.
Article 4	Provides that the planning authority may give direction to restrict the effect of Article 3.

Town and Country Planning Act 1990 (as amended)

Section 55	Provides that 'development' includes the carrying out of building operations on land, and 'building operations' includes structural alterations or additions to buildings.
Section 57	Planning permission is needed for all development of land.
Section 187a	Enforcement for breach of conditions

PLANNING POLICY

National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development CP3 – General Principles for Development CP8 – Thames Basin Heaths Special Protection Area CP11 – Proposals Outside Development Limits (including Countryside)
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC03 – Green Infrastructure, Trees and Landscaping TB21 – Landscape Character TB24 – Designated Heritage Assets TB26 – Buildings of Traditional Local Character and Areas of Special Character
Other	Borough Design Guide Supplementary Planning Document

	Arborfield Garrison Strategic Development Location (SDL) Supplementary Planning Document (SPD) Finchampstead Neighbourhood Development Plan - Sept 2023 (FNDP)
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PLANNING HISTORY

No relevant planning history relating to the application site itself. However, the site falls within wider land at the previous "Arborfield Garrison" that was subject to the following Major housing redevelopment and SANG application:

Application No.	Description:	Decision & Date
O/2014/2280 (140977)	Demolition of existing buildings and redeveloping Arborfield Garrison for up to 2,000 homes, including 80 extra care units, alongside a district centre with retail, leisure, and community facilities, plus a secondary school, primary school, and extensive public open space. New roads, footpaths, cycleways, sustainable drainage, and flood mitigation. Full permission includes creation of two Sustainable Alternative Natural Greenspaces (SANGS), reusing the MoD gym for community use, and major junction and access improvements.	02 April 2015 APPROVED subject to a s106 legal agreement.

CONSULTATION RESPONSES

Internal

WBC Green Infrastructure – Objection
WBC Arborfield Garrison SDL Development Delivery Manager – Objection
WBC Landscape and Trees – Objection
WBC Highways – Further information required
WBC Drainage – No objection subject to condition
WBC Built Heritage Officer – No objection
WBC Ecology – No comments received
WBC Environmental Health – No comments received

External

Nature Space (GCN) – No objection
Berkshire Archaeology – Additional information required

REPRESENTATIONS RECEIVED

Parish	No comments received.
Ward Member(s)	No comments received.
Neighbours	No comments received.

APPRAISAL

SITE DESCRIPTION / PROPOSAL:

The application site is located within the West Court Suitable Alternative Natural Greenspace (SANG) that will serve the Arborfield Garrison Strategic Development Location (SDL) to the north. The SANG was originally earmarked within the Arborfield Garrison SDL Supplementary Planning Document (SPD) and now forms part of planning permission O/2014/2280 (140977). The detailed landscape masterplan (refer to Fig. 1 below) for the SANG was approved under discharge of conditions application 231335. The SANG is due to be formally opened for full public use in 2026.



Fig. 1: Extract of approved West Court SANG landscape masterplan - application site circled in red.

The site also located within the countryside, a Woodland Tree Preservation Order TPO- (1447/2012) and a Natural England 'Wood, Pasture and Parkland' designation. The site is approx. 240m south-east of 'West Court', a Grade II Listed Building (refer to Fig. 2 below). In addition, the site is located within The Thames Basin Heaths SPA (Special Protection Area).

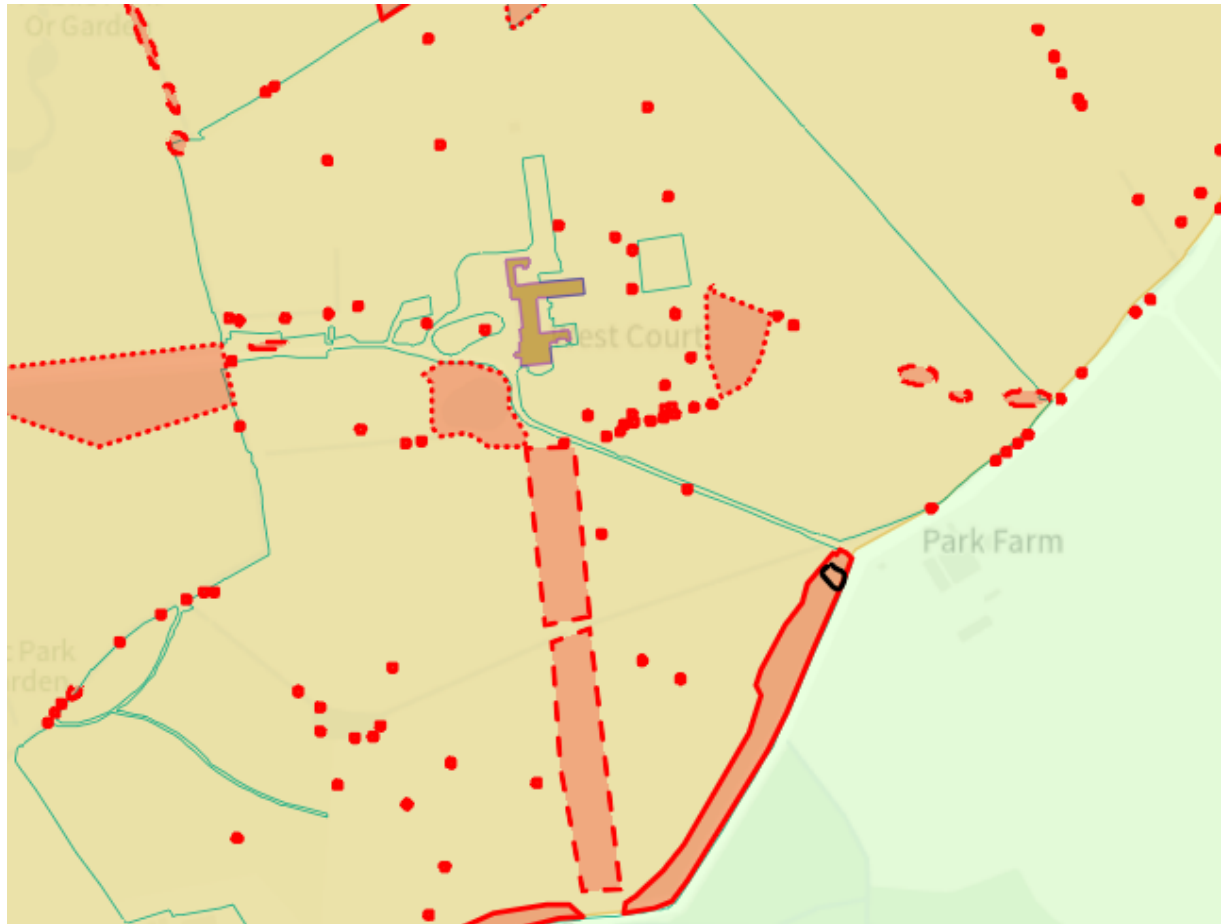


Fig. 2: Application site (black) in context of Arborfield Garrison SDL inc. West Court SANG (beige), Countryside (light green), West Court Grade II Listed Building (brown), Woodland Tree Preservation Order TPO-1447-2012 (red) and Natural England Wood, Pasture and Parkland designation (dark green).

The surrounding area, including that of the West Court SANG, comprises of a strong rural setting with open countryside located to the east, south and west. To the north, is the Arborfield Garrison Strategic Development Location (SDL). The closest buildings associated with Park Farm lie directly to the east of the application site approx. 60m away. The application site is located approx. 1.4km from Bohunt Secondary School to the north and 1km from the nearest child's nursery (Oak Tree Nursery at 13 Nine Mile Ride, Finchampstead).

This prior approval application is for the erection of a new 29.1m high lattice mobile phone mast that would be approx. 1.1m wide and include ancillary aerials, antennas and equipment housing (refer to Fig. 3 below). It would comprise a galvanised lattice steel frame and the applicant has advised that it could be painted any RAL or BS5252 colour required by the Council. The equipment housing and enclosure (approx. 10.5m x 8.5m) would have be of prefabricated steel with 2.4m high palisade fencing. The applicant has indicated that it would be finished in Goosewing Grey (RAL7035), also with the option to be coloured to any RAL or BS5252 specification if required.

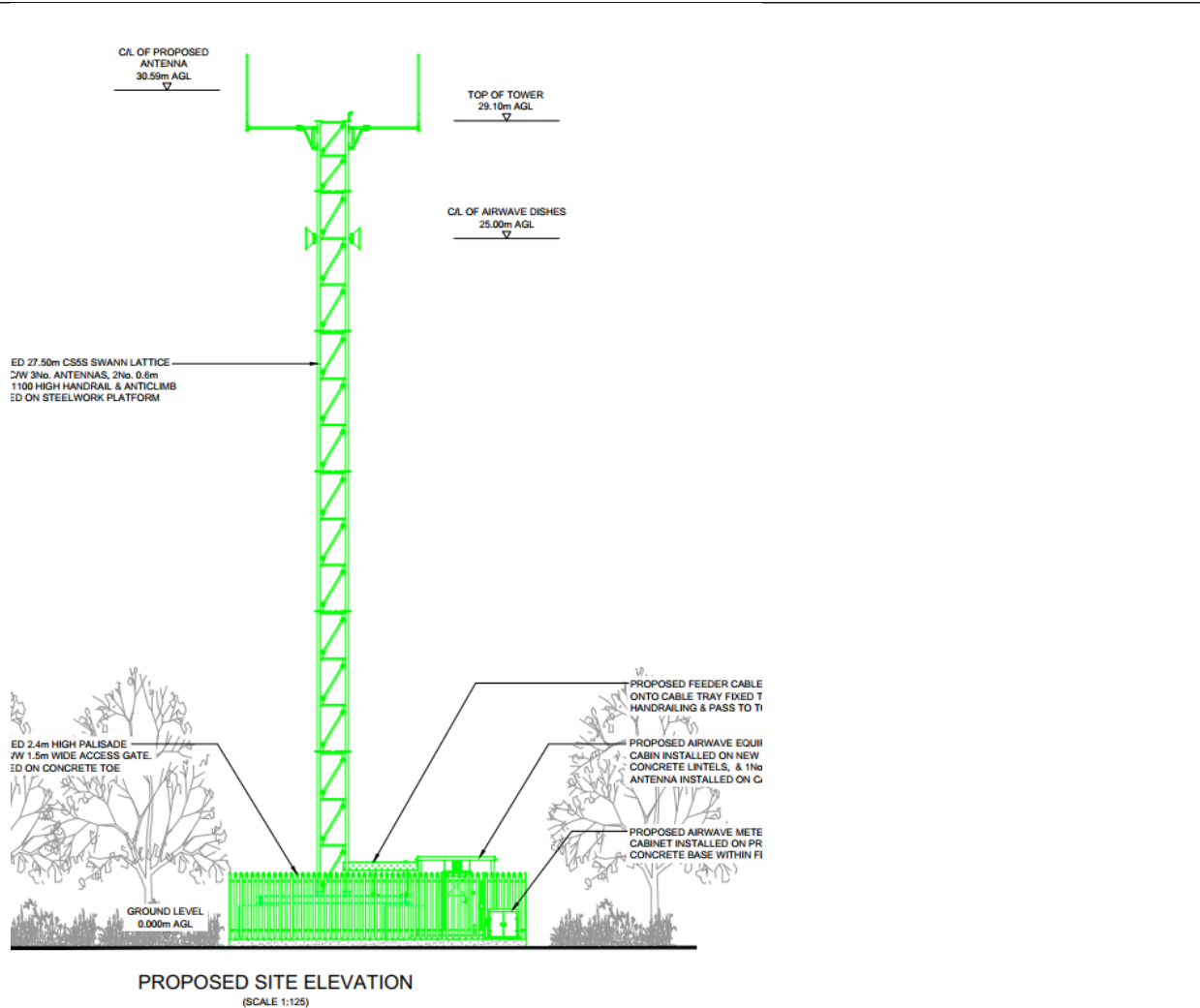


Fig. 3: Extract of proposed elevation

The applicant has advised that their existing base station at Church Farm (TVY048) must be removed because the landowner has secured permission for an agricultural building and served a formal Notice to Quit, requiring the site to be vacated. This action will leave a critical gap in the Airwave TETRA network, which provides secure communications for emergency services.

The applicant further explains that without a replacement site, large parts of Finchampstead and surrounding areas would lose the required in-building coverage, severely compromising public safety and national security by preventing reliable communication between emergency responders and control rooms. Existing and proposed coverage plots have been submitted which appear to verify this point. However, no cessation date has been provided in respect of the existing mast at Church Farm. Hence, the need for new coverage to replace that which would be lost when/if the base station at Church Farm is closed is not contested by the Council.

The factors for consideration when assessing this application is firstly whether or not the proposed development would fall within the parameters and restrictions of A.1 and A.2 of Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015.

APPRAISAL UNDER PART A.1			Yes	No
s.55	1	Does it constitute development?	✓	
s.191	2	Would it be contrary to an enforcement notice?		✓
s.187a Art.3 (4)	3	Would it be contrary to any condition imposed by any planning permission granted or deemed to be granted?		✓
Art.3(5)	4	Are the building operations involved in the construction of the original development lawful?	✓	
Art.4	5	Is there an 'Article 4 Direction' in effect for the site?		✓
Sch.2 Cl 16, Pt. A	6	Does it involve development by or on behalf of an electronic communications code operator for the purpose of the operator's electronic communications network in, on, over or under land controlled by that operator or in accordance with the electronic communications code, consisting of— (a) the installation, alteration or replacement of any electronic communications apparatus, (b) the use of land in an emergency for a period not exceeding 18 months to station and operate moveable electronic communications apparatus required for the replacement of unserviceable electronic communications apparatus, including the provision of moveable structures on the land for the purposes of that use, or (c) development ancillary to radio equipment housing.	✓	
Ground-based apparatus				
A.1(1)(a) and (b)	7	Does the electronic communications apparatus (<u>other than a mast</u>), excluding any antenna, exceed a height of 15 metres above ground level?		n/a
A.1(1)(c)	8	Does the mast, excluding any antenna, exceed a height of— (i) 30 metres above ground level on unprotected land; or (ii) 25 metres above ground level on article 2(3) land or land which is on a highway?		✓
A.1(1)(d) and (e)	8a	Refers to alteration or replacement of a mast		n/a
A.1(2)	8b	Refers to building-based apparatus		n/a
Apparatus on masts				
A.1(3)	9	Does the height of the mast (including the apparatus installed, altered or replaced) exceed any relevant height limit specified in paragraph A.1(1)(c)?		✓

Ground or base area				
A.1(7)	10	Does the electronic communications apparatus (other than a mast, antenna, any apparatus which does not project above the level of the surface of the ground or radio equipment housing) exceed an area of 1.5m2?		✓
Radio equipment housing				
A.1(9)	11	Does the radio equipment housing involve: (a) development that is not ancillary to the use of any other electronic communications apparatus; (b) the cumulative volume exceeding 90m2; or (c) on any article 2(3) land, or on any land which is, or is within, a site of special scientific interest, any single development would exceed 2.5 cubic metres, unless the development is carried out in an emergency?		✓ ✓ ✓
NOTES UNDER PART A.1				
8) The proposed structure has a maximum height of 29.1m. This excludes antennas. Other apparatus would be installed at a height of less than 15m above the ground. It would not be sited on Highway land. 8a) While the applicant has indicated that the proposed mast would be a 'replacement' for the existing mast at Church Farm, the proposal itself would not replace and existing at the application site. Indeed, the existing mast at Church Farm is approx. 1.4km away. Hence, A.1(1)(d) and (e) are not relevant. 9) As 8 above. 10) The cumulative site area of the ground based apparatus would exceed 1.5sqm. However, the proposed cabinets fall within the definition of radio equipment housing and are therefore excluded from this calculation. 11) The radio housing equipment is ancillary in nature and less than 90sqm; nor would any single item of development exceed 2.5 cubic metres. It does not fall within article 2(3) land or a site of scientific interest.				
APPRAISAL UNDER PART A.2 - Conditions				
<i>(1) Class A(a) and A(c) development is permitted subject to the condition that the siting and appearance of any antenna or supporting apparatus, radio equipment housing or development ancillary to radio equipment housing are such that the effect of the development on the external appearance of that building is minimised, so far as practicable.</i> Not relevant in this instance as proposal is not for siting on a building.				

APPRAISAL UNDER PART A.3 – Prior approval

- (1) Before making the application required by sub-paragraph (4), the developer must give notice of the proposed development to—*
- a) any person (other than the developer) who is an owner of the land to which the development relates, or*
 - b) a tenant of an agricultural holding any part of which is comprised in the land to which the application relates*
- (2) Notice must be given by or on behalf of the developer as follows—*
- a) by serving a signed and dated notice on every person described in sub-paragraph (1) whose name and address is known to the developer, stating—*
 - i) the name of the developer;*
 - ii) the address or location of the proposed development;*
 - iii) a description of the proposed development (including its siting and appearance which includes the height of any mast);*
 - iv) a statement that the developer will apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to the siting and appearance of the development;*
 - v) the name and address of the local planning authority to whom the application will be made;*
 - vi) a statement that the application is available for public inspection at the offices of the local planning authority during usual office hours;*
 - vii) a statement that any person who wishes to make representations about the siting and appearance of the proposed development may do so in writing to the local planning authority;*
 - viii) the date by which any such representations should be received by the local planning authority, being a date not less than 14 days from the date of the notice; and*
 - ix) the address to which such representations should be made; or*
 - b) if the developer has been unable to ascertain the names and addresses of every such person after taking reasonable steps, by local advertisement.*

The applicant has provided a copy of the developer notice sent to the existing landowner.

- (3) Where the proposed development consists of the installation, alteration or replacement of a mast within 3 kilometres of the perimeter of an aerodrome, the developer must notify the Civil Aviation Authority, the Secretary of State for Defence or the aerodrome operator, as appropriate, before making the application required by sub-paragraph (4).*

The site is not within 3km of an aerodrome.

- (4) Before beginning the development described in paragraph A.2(3), the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to the siting and appearance of the development.*

- (5) The application must be accompanied by—
- a) a written description of the proposed development and a plan indicating its proposed location together with any fee required to be paid;
 - b) the developer's contact address, and the developer's email address if the developer is content to receive communications electronically;
 - c) evidence that the requirements of sub-paragraph (1) have been satisfied where applicable; and
 - d) where sub-paragraph (3) applies, evidence that the Civil Aviation Authority, the Secretary of State for Defence or the aerodrome operator, as the case may be, has been notified of the proposal.

This application forms this requirement and the relevant documentation has been provided.

- (6) *Subject to sub-paragraphs (8)(b)(ii) and (c), upon receipt of the application in accordance with sub-paragraph (5), the local planning authority must—*
- a) *for development which, in their opinion, falls within a category set out in the Table in Schedule 4 to the Procedure Order (consultations before the grant of permission), consult the authority or person mentioned in relation to that category, except where—*
 - i) *the local planning authority are the authority so mentioned; or*
 - ii) *the authority or person so mentioned has advised the local planning authority that they do not wish to be consulted, and must give the consultees at least 14 days within which to comment;*
 - b) *in the case of development which does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated, or which would affect a right of way to which Part 3 of the Wildlife and Countryside Act 1981 (public rights of way)¹²⁴ applies, must give notice of the proposed development, in the appropriate form set out in Schedule 2 to the Procedure Order (notice of applications for planning permission)—*
 - i) *by site display in at least one place on or near the land to which the application relates, for not less than 21 days, and*
 - ii) *by local advertisement;*
- in the case of development which does not fall within paragraph (b) but which involves development carried out on a site having an area of 1 hectare or more,*
- c) *must give notice of the proposed development, in the appropriate form set out in Schedule 2 to the Procedure Order by local advertisement and either—*
 - i) *by site display in at least one place on or near the land to which the application*
 - ii) *relates, for not less than 21 days, or by serving notice on any adjoining owner or occupier;*
 - d) *in the case of development which does not fall within paragraph (b) or (c), must give notice of the proposed development, in the appropriate form set out in Schedule 2 to the Procedure Order—*
 - i) *by site display in at least one place on or near the land to which the application relates for not less than 21 days, or*
 - ii) *by serving notice on any adjoining owner or occupier.*

Prior approval is required but parts (b)-(d) are not applicable in this instance.

- (7) When determining the application made under sub-paragraph (4), the local planning authority must take into account any representations made to them as a result of consultations or notices given under paragraph A.3.*

Relevant consultation responses and representations outlined above and discussed in this report.

- (8) The development must not begin before the occurrence of one of the following—*
- a) the receipt by the applicant from the local planning authority of a written notice of their determination that prior approval is not required;*
 - b) where the local planning authority gives the applicant written notice that prior approval is required—*
 - i) the giving of that approval to the applicant, in writing, within a period of 56 days beginning with the date on which the local planning authority received the application in accordance with sub-paragraph (5);*
 - ii) the expiry of a period of 56 days beginning with the date on which the local planning authority received the application in accordance with sub-paragraph (5) without the local planning authority notifying the applicant, in writing, that such approval is given or refused; or*
 - c) the expiry of a period of 56 days beginning with the date on which the local planning authority received the application in accordance with sub-paragraph (5) without the local planning authority notifying the applicant, in writing, of their determination as to whether such prior approval is required.*

Prior approval is required and this forms part of the assessment of this application below.

- (9) The development must, except to the extent that the local planning authority otherwise agree in writing, be carried out—*
- a) where prior approval has been given as mentioned in sub-paragraph (8)(b)(i), in accordance with the details approved;*
 - b) in any other case, in accordance with the details submitted with the application.*
- (10) The agreement in writing referred to in sub-paragraph (9) requires no special form of writing, and, where that agreement is in place, there is no requirement on the developer to submit a new application for prior approval in the case of minor amendments to the details submitted with the application for prior approval.*
- (11) The development must begin—*
- a) where prior approval has been given as mentioned in sub-paragraph (8)(b)(i), not later than the expiration of 5 years beginning with the date on which the approval was given;*
 - b) in any other case, not later than the expiration of 5 years beginning with the date on which the local planning authority received the application in accordance with subparagraph (5).*

9, 10 and 11 above would form conditions on the 'prior approval' decision if it were granted.

- (12) *In the case of emergency, development is permitted by Class A subject to the condition that the operator must give written notice of such development as soon as possible after the emergency begins, to—*
- a) the local planning authority; and*
 - b) in the case of development carried out on land which is, or is within, a site of special scientific interest, to Natural England¹²⁵.*

Not applicable.

- (13) When computing the number of days in sub-paragraphs (6)(b)(i), (6)(c)(i) and (6)(d)(i), any day which is a public holiday must be disregarded.

Noted.

Hence, pursuant to paragraph A.3 above and given prior approval IS required, the following appraisal on the siting and appearance of the development is provided.

Siting and Appearance

Character

Core Strategy Policy CP3 requires development to respect the character of its surroundings, while CP1 seeks to maintain or enhance the high quality of the environment. Policy CC03 protects existing trees and landscape features, and TB21 requires proposals to conserve and enhance the borough's distinctive landscape character.

The Finchampstead Neighbourhood Development Plan - Sept 2023 (FNDP) indicates that *“overall, the parish has retained its semi-rural character and residents place great value upon the general appearance of ‘greenery’ and ‘openness’ and want these to be protected”*. The FNDP, however also identifies ongoing pressures on this landscape, including *“increasing demand for communication masts, pylons and poles leads to visual intrusion of these elements in the elevated landscape and in views to the wooded backdrop from elsewhere.”*

The Arborfield Garrison SDL SPD advises that telecommunications equipment should be carefully designed and integrated to avoid visual intrusion.

The application site lies within the Finchampstead Forested and Settled Sands Landscape Character Area, which is defined by its wooded belts, heathland remnants, and semi-rural openness. This landscape is highly sensitive to vertical structures that break the skyline. The proposed 29.1m lattice mast would protrude approximately 5m above the tree canopy, introducing a stark, engineered feature that interrupts the natural skyline and erodes the sense of enclosure provided by mature woodland. While the applicant claims the slimline lattice design reduces visual impact, this is not accepted; the mast's considerable height and utilitarian appearance would remain incongruous in this rural setting.

The applicant identifies the proposed structure as a 'slimline lattice mast' chosen to be visually more permeable and less bulky than a solid monopole and claims that this

design helps the mast blend into the landscape rather than appearing as a dominant feature. This claim is not accepted by officers. The 'slimline lattice mast' design of the mast would only result in a marginal improvement compared to that of a solid mast given its considerable height and visually sensitive setting.

The mast would be partially screened by surrounding trees (less during winter months due to leaf shedding), with approx. 5m protruding above the canopies of nearby trees currently protected by Woodland TPO (1447/2012). While this may reduce its visibility from viewpoints to the south-east along Park Lane, the proposed mast and its ancillary cabinets and equipment would be highly visible from multiple locations within the West Court SANG (refer to Fig. 4 below).



Fig. 4: Photo. taken from SANG looking North-East towards Park Lane and the application site

The Council's Senior Landscape Officer objects to this application and comments that *"there is no information provided as part of the application as to the number or details of trees that are to be removed as part of the proposals. We would expect as a minimum a tree survey and arboricultural impact assessment in accordance with BS 5837 and required by Local Plan policy CC03. The Proposed Site Plan (Rev B) does not provide any details on the tree resource either to be retained or removed or whether any of the existing trees and their corresponding root protection area retained outside the development area will be impacted by the proposals. Regardless of the lack of information on trees, I object to the application due to the proposed removal of TPO trees."*

The applicant has advised that the proposal would use a gravity-based, non-ground penetrating foundation, avoiding damage to tree roots and preserving the natural environment. However, insufficient information in this respect has been provided, as outlined by the Council's Senior Landscape Officer's comments above.

Hence, it is considered that the utilitarian appearance and excessive height and bulk of the proposed mast and its ancillary equipment would be very much at odds with the rural and verdant character and appearance of the site, West Court SANG and the surrounding open countryside. A design that would be more suited to an industrial or commercial area. The proposal also fails to demonstrate that it would not have a detrimental impact on existing trees, the removal of which would further degrade the quality of the area.

The proposal therefore conflicts with Core Strategy Policies CP3 and CP11, MDD Policies CC03 and TB21 and with guidance within the Arborfield Garrison SDL SPD and FNDP.

West Court SANG and Thames Basin Heath Special Protection Area (SPA)

The Thames Basin Heaths SPA (Special Protection Area) was designated under European Directive due to its importance for heathland bird species. Core Strategy policy CP8 establishes that new residential development within a 5km zone of influence is likely to contribute to a significant impact upon the integrity of the SPA. The Arborfield Garrison SDL lies wholly within this zone and, in accordance with Core Strategy Policies CP8, and CP18 and saved South East Plan Policy NRM6, mitigation is required in the form of SANG. As described within the 2015 officer report for Arborfield Garrison, the impact of 2,000 additional homes is mitigated (in part) through the provision of a c. 24ha SANG at West Court.

The Council's Arborfield Garrison SDL Development Delivery Manager objects to this application commenting that *"SANG must be sufficiently attractive to draw visitors away from the SPA and offer a similar recreational experience in a natural setting. It should therefore replicate the qualities that attract visitors to the SPA, such as open heathland, woodland, and naturalistic features. Natural England's Design Criteria emphasize that the site must avoid urban or industrial features that compromise its attractiveness. [At 29.1m high], the proposed mast would rise above the tree canopy, creating a stark vertical element visible from walking routes. This would be in conflict with the approved landscape strategy and intended purpose of the SANG"*.

The Council's Green Infrastructure Officer also objects to this proposal commenting that *"the loss of natural habitat and screening, and the significant urbanising effect of the proposed infrastructure not only result in a degraded version of the existing green infrastructure, but could feasibly lead to reduced usage of the SANG by its core target population (users of the Thames Basin Heaths SPA), which is not acceptable."*

Similarly, the Council Senior Landscape Architect has commented that *"the woodland belt in which the site is located contributes to the semi-natural space as required by the SANG Guidelines and as well as contributing to the wider landscape character around the site. Therefore, any removal of trees and inclusion of built development including a 29.1m mast will have a detrimental and harmful effect on the SANG and the wider countryside character contrary to Core Strategy CP3 and Local Plan Policy TB21 and one which I cannot support."*

As indicated above, key consultees on this application have raised strong objections to the proposed mast within West Court SANG. The proposed mast would be highly

prominent from multiple vantage points within the SANG, eroding its naturalistic and rural appearance and sense of tranquillity. This visual intrusion would make the SANG a less attractive option for recreation, particularly for dog walking, reducing its effectiveness as SPA mitigation. Consequently, the development would result in both harm to the visual character of the SANG and a detrimental impact on its usability and purpose. This harm weighs heavily against the proposal and is considered to significantly outweigh the operational benefits of the scheme in the planning balance.

Highway safety

Core Strategy policy CP6 requires development to provide safe and convenient access for all road users, avoid adverse impacts on the transport network and demonstrate that appropriate measures are in place to manage travel demand and ensure highway safety.

The Council's Highways officer has requested clarification on the following issues:

- Delivery details for removal and installation works associated with this proposal,
- Details of construction access; if creating new vehicular access, visibility splays will need justification.
- The applicant should note width restriction along site frontage; separate consent may be needed if construction vehicles exceed this limit.
- Swept path analysis for the largest delivery vehicle to show adequate manoeuvring and turning space for entering and exiting in forward gear along the proposed route will be required.

While it is noted that visits to the proposed facility would be limited, the absence of the above information, the lack of swept path analysis and clarity on access arrangements are fundamental to assessing highway safety impacts contrary to policy CP6. Therefore, the proposal fails to demonstrate acceptability in this respect and warrant a reason for refusal. These details could not reasonably be secured by condition.

Alternative sites

The NPPF (Para. 122) requires operators to provide evidence to justify the proposed development, this includes *“for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure”*. In this respect, Section 5 of the submitted Supplementary Information Form includes alternative locations that have been assessed and discounted by the applicant for various reason. These sites have been compiled by address in Fig. 5 below, along with the Council's comments on the validity of arguments for discounting these sites as potential locations.

Site Name & Address	Reason for Rejection (Applicant)	Observations (Council)
Land outside Park Farm, Park Lane, RG40 4QH	Grass verge adjacent to highway not shielded; too many underground services (gas and water).	Claim about underground services lacks evidence from utility providers or feasibility checks. Other land at Park Farm not explored with landowner.

Land north side of White Horse Lane, RG40 4LZ	Alternative relocated positions examined; landowner refused relocation.	Private ownership refusal alone is not sufficient justification; no evidence of negotiation or consideration of compulsory powers ¹ .
Coveford, White Horse Lane, RG40 4LZ	Landowner unwilling to accommodate installation; site used for horses.	Private ownership refusal alone is not sufficient justification; no evidence of negotiation or consideration of compulsory powers.
California Country Park, Nine Mile Ride, RG40 4HT	Topographical features and tree clutter meant no replacement coverage achievable.	Technical reason stated but lacks supporting specific coverage plots or engineering analysis.
Nine Mile Ride Industry, 66 Nine Mile Ride, RG40 4NE	Landowner unwilling to accommodate electronic communications.	Private ownership refusal alone is not sufficient justification; no evidence of negotiation or consideration of compulsory powers.
White Horse Lane, RG40 4LX	Landowner looking to redevelop land/change use.	No evidence that temporary or shared use was considered.
Cellnex Church Farm (existing telecoms site)	Would require redevelopment and height increase; near village church impacting visual amenity; landowner unwilling.	Insufficient justification or evidence provided re extent of visual impact. Private ownership refusal alone is not sufficient justification; no evidence of negotiation or consideration of compulsory powers.
Finchampstead Cricket and Football Club	Privately owned with no third-party access; topography and tree density prevent coverage.	Lack of technical evidence for coverage failure; access issues might be negotiable.
Park Farm (multiple positions), RG40 4QH	Would require new highway access and disconnected from electricity supply; landowner unwilling.	No cost-benefit analysis or alternative engineering solutions provided.
EE Ivanhoe Road, RG40 4QQ	10m streetworks site incapable of sharing.	Technical reason plausible but lacks supporting structural feasibility evidence.
Cellnex Ducks Nest Farm	Too far west to provide coverage.	No coverage plots provided to substantiate claim.

¹ Under the Electronic Communications Code (Schedule 3A of the Communications Act 2003), telecom operators have rights to install and maintain apparatus on land, subject to certain conditions. If negotiations fail, operators can apply to the Upper Tribunal (Lands Chamber) for an order granting access rights. This is not the same as compulsory purchase by a local authority, but it is a legal route to override landowner refusal where the public interest is significant - such as maintaining emergency services coverage.

EE Crest Wick Hill, RG40 3SW	Warren Farm,	Sharing only possible below EE antennas; antennas fail to clear trees.	Technical reason stated but lacks supporting coverage plots or alternative design options.
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Fig. 5: Table of alternative sites considered and discounted by the applicant

Hence, all the above alternative sites were all deemed unsuitable by the applicant for the variety of reasons mentioned. However, the reasons provided have not been robustly justified as outlined in the right-hand section of the table above.

In addition, the applicant hasn't assessed the potential for siting options the existing and proposed commercial areas to the north. These include Hogwood Industrial Estate (as marked with a **X** in Fig. 6 below) that lies less than 1km north of the application site (circled in red in Fig. 6), and the proposed employment area (shaded blue within Fig 5 below) within Finchwood Park (previously Hogwood Farm) which forms part of the Arborfield Garrison SDL. Both of which would appear to fall within the area of potential coverage shortfall as indicated in the submitted 'Predicted Coverage TVY048 off' plan.

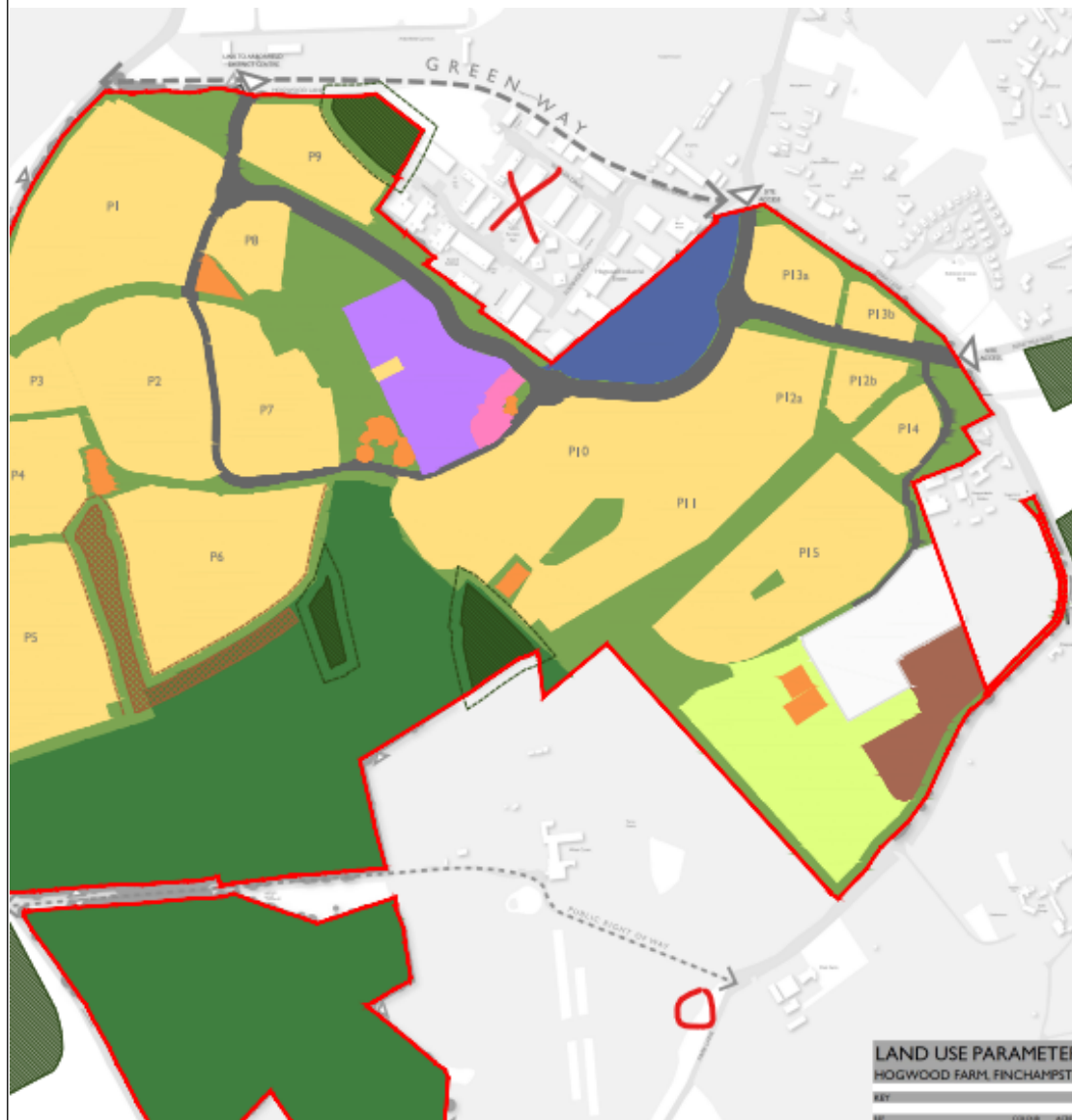


Fig. 6: Extract of Land Use Parameter Plan - Finchwood Park (Arborfield Garrison SDL) – PP 181194

Hence, it is considered that inadequate technical information has been submitted to demonstrate that the assessment of possible alternatives with reduced visual impact have been robustly reviewed and discounted by the applicant in line with guidance contained within the NPPF.

Masts and health

In accordance with the NPPF (Para. 122), a Health and Safety Statement and Declaration of Conformity with ICNIRP Public Exposure Guidelines was submitted with the application. This confirms that the proposal would comply with acceptable levels of Radio Frequencies (RF's) as outlined by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Public Exposure Guidelines. In addition to any RF's generated by the proposed mast, the submitted ICNIRP certificate takes account of the cumulative effect of the RF emissions from all base stations in the vicinity of the application site.

In terms of potential health risks, the proposal has been assessed in light of supporting technical information, i.e. ICNIRP certificate, submitted by the applicant in respect of acceptable levels of RF exposure. The government's advice is clear on this matter in that local authorities should not seek to determine public health safeguards if the proposal meets the International Commission guidelines for public exposure. Furthermore, the site is not adjacent to what are perceived to be particularly sensitive uses. The nearest school or nursery is over 1km away.

Therefore, it is considered that there are no exceptional circumstances in relation to this application that warrant elevating the status of perceived health risks as a material consideration above that of other approved base stations within suburban areas of Wokingham or, indeed, against the advice provided within the NPPF outlined above.

(1) Class A development is permitted subject to the condition that any electronic communications apparatus provided in accordance with that permission is removed from the land or building on which it is situated as soon as reasonably practicable after it is no longer required for electronic communications purposes; and such land or building is restored to its condition before the development took place, or to any other condition as may be agreed in writing between the local planning authority and the developer.

2 above would form a condition on the 'prior approval' decision if granted.

(2) Class A development...on unprotected land where that development consists of—

- i) the installation of a mast;
- ii) the alteration or replacement of a mast which, when completed—
 - (aa) is taller than the mast which existed prior to such alteration or replacement; and
 - (bb) exceeds a height of 25 metres above ground level;
- iii) the construction, installation, alteration or replacement of radio equipment housing, where the volume of any single development exceeds 2.5 cubic metres,

is permitted subject, except in case of emergency (in which case only paragraph A.3(12) applies), to the conditions set out in paragraph A.3 (prior approval).

The volume of each of the 4 ground-based cabinets would be under 2.5m³ which therefore accords with part (iii).

OTHER ISSUES:

Drainage

The Lead Local Flood Authority (LLFA) has advised that the application site is in Flood zone 1 and low risk from surface water flooding according to the EA mapping. A condition has been requested to secure a sustainable urban drainage system for the development. However, the submitted plans indicated that there would be only a nominal increase in impermeable area with ancillary 'hardstanding' being in the form of permeable grasscrete for the proposed parking area and gravel infill for the compound. As such, the only impermeable area created would be that of the proposed mast and cabinets, the combined area of which would not be so significant as to warrant a bespoke SuDS system. Hence, the condition sought by the LLFA is not recommended.

Impact on residential amenity

Given the significant separation distance retained between any residential properties, no adverse impact on private residential amenity would occur.

Ecology - Great Crested Newts (GCN)

Nature Space has advised that the site lies within an amber impact zone on the district licence impact map, indicating suitable habitat for GCN, therefore the applicant should provide a Reasonable Avoidance Measures (RAMs) statement prepared by a qualified ecologist to minimize risks. Additionally, the applicant is reminded that under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, it is an offence to harm or disturb GCN or their habitats. Planning approval does not override these legal protections. Hence, should prior approval be granted, Nature Space has recommended an informative to highlight that if GCN are encountered during works, all activity must stop, and Natural England should be contacted for guidance.

Heritage

The proposed mast would be located within West Court SANG that historically had once been part of the parkland grounds of West Court, a former country house that today is a hotel set within its own grounds. West Court, a grade II listed building is the closet of the designated heritage assets that lie in the vicinity of the site of the proposed mast, being sited over 250m away those other identified listed buildings being sited over 500m from the site of the proposed mast.

The Council's Building Conservation Officer has advised that due to the significant distance and intervening screening provided by soft landscaping and trees, the proposed mast would only be partially visible from West Court, primarily when trees are not in leaf. Hence, they have advised that the proposal would not harm the setting

of West Court or other nearby listed buildings. Accordingly, there is no heritage objection to this proposal.

Archaeology

The application site lies within an area with archaeological potential. Berkshire Archaeology has reviewed the proposal and have advised that before the need for any archaeological mitigation can be considered, clarification from the applicant would need to be provided on the extent and depths of any ground works required for this development, if the application were to be approved.

The Public Sector Equality Duty (Equality Act 2010)

In determining this application, the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. There is no indication or evidence (including from consultation on the application) that persons with protected characteristics as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application and there would be no significant adverse impacts as a result of the development.

Pre-Application Advice

The applicant is factually incorrect in stating that pre-application advice was sought from the local planning authority under App. ref.: 241573. For clarity, app. ref.: 241573 (for which no fee was submitted) was a code notice served under regulation 5 of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, i.e. it was not an application for planning permission or prior approval. However, this notice was issued in error as the development (a 27m high mast) was not exempt from the prior approval process given its height. Regardless, it was clearly not a formal pre-application request for either development proposal.

Traffic Light Rating System (TLRS)

The DCMS 'Code of Practice for Wireless Network Development in England' (2021) identifies indicates that Operators can refer to the 'Traffic Light Rating System' as a general guide for consultation and engagement requirements. However, the outcome of this has no bearing on the overall acceptability of a proposal. This needs to be judged on the planning merits of the scheme whether a full planning or prior approval application.

The applicant advises that *"an assessment for the purposes of establishing the appropriate level of consultation has been carried out. Using this Traffic Light Rating assessment, the option of the replacement slimline lattice mast has been categorised 'green'. As such and given that the site is divorced from residential or educational facilities and is screened by 22m tall trees, we intend to rely upon the statutory consultation process of the application."*

The Council has undertaken its own public consultation exercise for this prior approval application and notes that no public objections have been received.

Social and economic benefits and planning balance

The applicant has identified that the proposed mast is critical to maintaining Airwave's TETRA network, which provides secure, resilient, and interoperable communications for all UK emergency services, including Police, Fire, and Ambulance. The applicant suggests that removal of the existing site (TVY048 at Church Farm) without replacement would result in a complete loss of contractual in-building coverage for Finchampstead, Arborfield Green, Eversley, Farley Hill, and surrounding areas. This would severely compromise public safety and national security. The Council is not in a position to question these claims given their technical nature.

The applicant has also indicated that Airwave is contractually required by the Home Office and Thames Valley Police to provide enhanced coverage (E2 level, +15dB) ensuring 97% in-building radio coverage within the defined area. Failure to maintain this coverage would prevent emergency responders from communicating effectively during incidents, risking lives and property. These benefits have been considered.

The proposal harms the visual amenity of the surrounding rural area and character and appearance of the West Court SANG, thereby undermining its effectiveness. This is afforded very significant weight and outweighs the merits of the proposed development. Moreover, inadequate assessment of potential alternative sites has been carried out.

CONCLUSION:

The proposal constitutes development but benefits from permitted development under Article 3 in Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015 and the **prior approval of the local planning authority as to its siting and appearance of the development IS required**. However, Prior Approval for the siting and appearance of the development is recommended to be **REFUSED** given the above concerns.

RECOMMENDATION	
Conditions agreed:	n/a
Recommendation:	Prior Approval required but REFUSED.
Date:	
Earliest date for decision:	

Recommendation agreed by: (Authorised Officer)	<i>BJC</i>
Date:	11.12.25

Draft reasons for refusal:

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.