

Green Infrastructure Appeal Statement

Date: 26/06/26

Application No.	252762
Appeal Reference:	APP/6011060
Appeal Site:	West Court Land, Park Lane, Finchampstead, Wokingham, RG40 4QF
Proposal:	Prior approval submission for a proposed installation of replacement electronic communications apparatus comprising a slimline lattice mast, 3 no. aerials, 2 no. transmission dishes, 1 no. GPS aerial, radio equipment housing and development ancillary to radio equipment housing.

Author

My name is Finlay Rothery, and I am a Green Infrastructure Officer at Wokingham Borough Council (WBC). I have been in post since September 2025. Prior to this, I worked for WBC's Countryside Service team for 13 years, managing and maintaining open spaces including play areas, amenity greenspaces, country parks, nature reserves and Suitable Alternative Natural Greenspaces (SANGs).

I have been actively involved in monitoring the delivery and adoption of West Court SANG, which the appeal site sits within, since taking over as Green Infrastructure Officer in September of last year and previously was involved in the management of the adjacent SANG in my previous role. I am, therefore, very familiar with the appeal site.

1. Reason for refusal

1.1 WBC Green Infrastructure commented on the proposal on 28th November 2025, recommending refusal.

1.2 This statement provides evidence in support of reasons for refusal 1 and 2 of planning application 252762, which are as follows:

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. Background

3.1 The appellant proposes to install replacement electronic communications apparatus comprising a 6m tall slimline lattice mast, 3 no. aerials, 2 no. transmission dishes, 1 no. GPS aerial, radio equipment housing and development ancillary to radio equipment housing.

- 3.2 The application site is within the boundary of the new West Court Suitable Alternative Natural Greenspace (SANG), which directly adjoins the older Finchwood Park SANG.
- 3.3 'Suitable Alternative Natural Greenspace' (SANG) is the name given to green space that is of a quality and type suitable to be used as avoidance within the Thames Basin Heaths Planning Zone. Its role is to provide alternative green space to divert visitors from visiting the Thames Basin Heaths Special Protection Area (SPA). SANGs are intended to provide avoidance measures for the potential impact of residential development on the SPA by preventing an increase in visitor pressure on the SPA.
- 3.4 The effectiveness of SANG as mitigation will depend upon the location and design. These must be such that the SANG is more attractive than the SPA to users of the kind that currently visit the SPA.
- 3.5 West Court SANG was required as part of the mitigation strategy for a development of up to 2000 houses (planning reference 140977) in order to pass the Habitats Regulations Assessment.

4. Policy

4.1 Core Strategy Policy CP8 and Saved South East Plan Policy NRM6 - Thames Basin Heaths Special Protection Area

These policies state that development which alone or in combination is likely to have a significant effect on the Thames Basin Heaths Special Protection Area (TBH SPA) will be required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered. Such measures must be agreed with Natural England. The West Court SANG has been created in line with this policy to offset the negative impact of increased population on the TBH SPA, which would result from the nearby housing developments. It is therefore important to protect the SANG for it to perform this function. Further detail on the requirements of SANG, as defined by Natural England, are detailed below in section 5.

4.2 Core Strategy Policy CP3 – General Principles for Development

This policy states that permission will be granted for proposals which have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses. The application involves the removal of trees in a mature hedgerow and shaw, which are protected by a tree

preservation order (TPO). As such, there would be detrimental impact upon an important ecological and landscape feature.

4.3 Managing Development Delivery (Local Plan) Policy TB21: Landscape Character

This policy states that proposals shall retain or enhance the condition, character and features that contribute to the landscape. As above, the loss of the TPO-protected trees would neither retain nor enhance this landscape feature. As such, the proposal is not compliant with this policy.

4.4 Managing Development Delivery (Local Plan) Policy CC03: Green Infrastructure, Trees and Landscaping

This policy states that proposals should protect and retain existing trees, hedges and other landscape features. As above, the loss of the TPO-protected hedgerow trees would neither retain nor protect this landscape feature. As such, the proposal is not compliant with this policy.

5. Natural England Guidelines on SANG

5.1 SANGs are new or existing open spaces designed to attract visitors away from the TBH SPA by providing an enjoyable natural environment for recreation. The expectation is that by providing these alternative areas for outdoor recreation, there will not be an increase in recreation pressure on the SPA as new households can use the SANG instead of the protected heathland. SANGs are high quality open space that will remain in perpetuity.

5.2 Natural England is the statutory body which sets out guidelines for SANG. SANG design is agreed with Natural England at the planning stage, and it is then expected that the SANG will be developed to the approved designs.

5.3 In Natural England's Guidelines for the Creation of SANGS August 2021 (Appendix 1), the following points are stated:

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.

However, SANG would be expected to have adequate car parking with good information about the site and the routes available. Some subtle waymarking would also be expected for those visitors not acquainted with the layout of the site.

Other infrastructure would not be expected and should generally be restricted to the vicinity of car parking areas where good information and signs of welcome should be the norm, though discretely placed benches or information boards along some routes would be acceptable.

5.4 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.

5.5 In the document “Thames Basin Heaths Special Protection Area Strategic Solution Natural England Advice to Local Planning Authorities” dated August 2025 (Appendix 2), the following guidance is given:

There should be certainty, beyond reasonable scientific doubt, that any SANG will be effective mitigation and in place for the “lifetime of the development”. This in-perpetuity period is usually a minimum of 80-125 years. The SANG should be kept to the required quality SANG standard for that time, as detailed in the SANG Management Plan, ensuring that the SANG criteria are met from first occupation, through the lifetime of the development, to act as a sufficient draw for potential SPA visitors.

5.6 The addition of artificial infrastructure, as in this proposal, represents a deterioration of the SANG design approved by Natural England and the LPA, and would constitute a failure to ensure “that the SANG criteria are met from first occupation, through the lifetime of the development”.

6. Response to Appeal Statement

6.1 In paragraph 2.5 of the Appeal Statement, it is stated that:

“Notwithstanding the TPO discussed below, the appeal site doesn’t impact on any environmental, heritage or amenity designations.”

While the site itself is not designated, the site is secured as SANG, which is a fundamental measure to mitigate likely significant effects on the Thames Basin Heaths SPA - a designated site of international importance.

6.2 In paragraph 4.2 of the Appeal Statement, it is stated that:

“Most of this design can be found in National Park, National Landscapes and other amenity designations all across the UK...It would be unlikely that anyone using the SANG would expect to not see development which could be construed to be urban – this being immediately adjacent to a large new housing development. In any event, and ironically, 30m lattice masts are proportionately far more common in rural and countryside locations than urban locations where smaller pole-type masts are more common.”

And in paragraph 4.3:

“Set out above, communications masts can be found in some of the most attractive and popular tourist areas across the UK and Europe – these areas remain popular despite the masts. The LPA has produced no evidence that visitor numbers to SANGs (specifically) drop-off when a communications mast is introduced - it is very unlikely there is such evidence. As the submitted photos show, there will be little impacts from the walking paths in the SANG.”

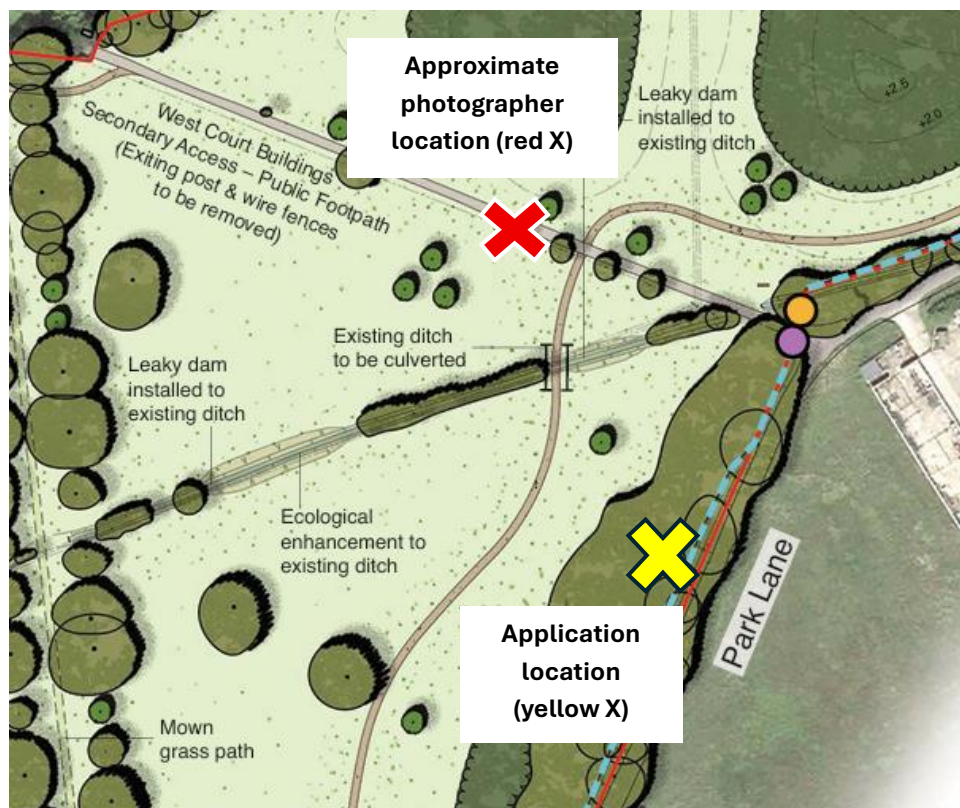
6.3 As detailed previously in paragraph 4.3, Natural England, who set out SANG requirements, state that:

“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.”

- 6.4 While it may be true that the proposed mast is present in amenity designations elsewhere, this guidance from Natural England clearly states that artificial infrastructure and urban influence are not desirable in SANG.
- 6.5 Any visual impact of the neighbouring housing development on the SANG would have been considered during the SANG application process and/or the housing development application process, and as such, was deemed acceptable by both Natural England and the LPA. Importantly, the housing development 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.
- 6.6 With regard to the appellant's statement that there is a lack of evidence that "*visitor numbers to SANGs (specifically) drop-off when a communications mast is introduced - it is very unlikely there is such evidence*", the absence of such evidence is not a sound argument that the introduction of such infrastructure does not impact visitor numbers/enjoyment of the SANG. The proposal is to install infrastructure that poses a risk to the attractiveness of the SANG, and therefore, it is the appellant's responsibility to demonstrate that the proposal will not have this impact. Insufficient evidence of this has been provided by the appellant.
- 6.7 With regards to the visual impact of the mast on the SANG footpaths, I have included below the photo submitted by the appellant in Appendix 1 of the Appeal Statement (doc ref: APP - Appendix 1 Photos with mast), titled "View 1 – from north of the mast on SANG footpath".



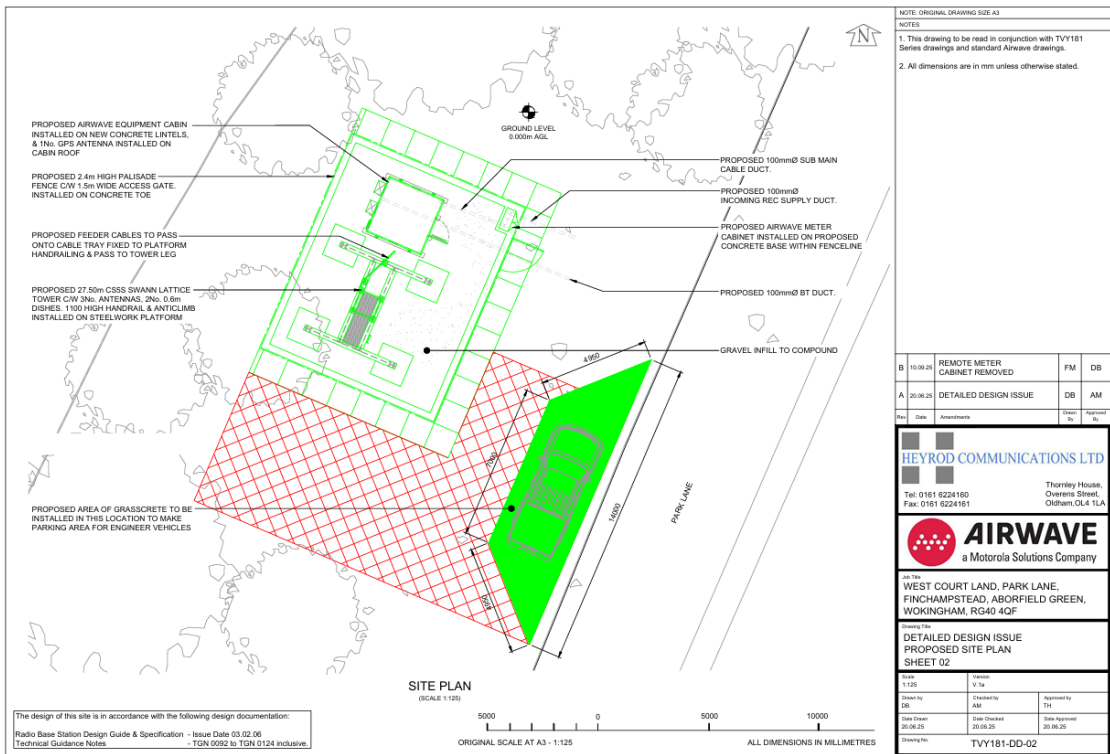
- 6.8 This photograph is not taken from the closest footpath to the mast, which I have marked in red on the photograph. It also places a standard planted tree in the foreground, blocking any visible elements of the base structure from this particular angle. This photograph represents a single viewpoint from within the SANG but does not demonstrate the view of the mast and base structure from the closer path, or other positions within the SANG to the north or immediate west of the proposed structure. It does also not appear to account for any proposed loss of trees.
- 6.9 The absence of an arboricultural survey stating the heights of the neighbouring trees means it is difficult to ascertain if the height of the mast shown in the above photograph is reflective of its true scale.
- 6.10 In the image below (snipped from the SANG layout plan), I have marked the location I believe the photograph was taken from, as well as the location of the proposed structure, to demonstrate how this choice of photograph location does not fairly demonstrate the visual impact of the structure on the SANG, other than from this one particular position.



6.11 The photograph below (taken in November 2025), shows the view of the application site from the closest section of footpath. From this point of the site, and along the rest of this stretch of footpath, not only would the mast be much more visible and imposing, but the base structure and palisade fencing would be extremely prominent.



6.12 The below is the proposed site plan submitted by the appellant (doc ref: REVISED - Proposed Site Plan Ver. V.1a), which shows that the base structure and parking area cover at least 2/3 of the width of the hedgerow and shaw, meaning both the base structure and 2.4m high palisade fencing would be very visible from the entire path section running alongside the application site.



6.13 Below are the photos and proposed site elevation plan supplied by the appellant, which show existing examples of the proposed mast and base structure and the relative size. I have included these here to highlight the contrast between the semi-natural environment and ecologically important hedgerow/trees and the highly urban and artificial proposed structure.



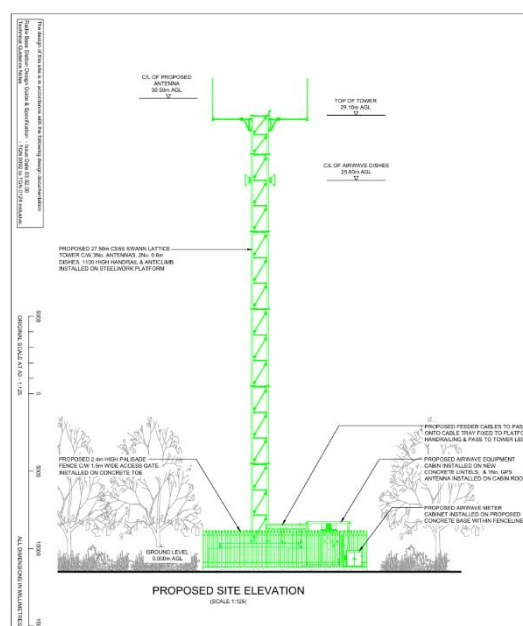
Doc ref: 20201007 112153 - Photo



Doc ref: 20201007 112123 - Photo



Doc ref: 20201007 111958 - Photo



Doc ref TVY181 Proposed Site Elevation

7. Conclusion

- 7.1 This statement has laid out arguments in support of reason for refusal 1 and 2.
- 7.2 The proposal is not compliant with the discussed policies, and particularly, is in conflict with the purpose and character of the SANG, which plays an important role in the protection of the internationally important Thames Basin Heath Special Protection Area. The sensitivity of the SANG to urbanising infrastructure means it is not a suitable site for the proposed mast.

Appendices (Uploaded Separately)

Appendix 1 - Natural England's Guidelines for the Creation of SANGS August 2021

Appendix 2 - Thames Basin Heaths Special Protection Area Strategic Solution Natural England Advice to Local Planning Authorities August 2025