

PLANNING STATEMENT

Land Adjacent to Phoenix Park, Hurst

Prepared by Pro Vision on behalf of Ratesu Limited

June 2025

LAND ADJACENT TO PHOENIX PARK, HURST

PLANNING STATEMENT

PROJECT NO. 51689

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DATE:

JUNE 2025

PRO VISION

THE LODGE

HIGHCROFT ROAD

WINCHESTER

HAMPSHIRE

SO22 5GU

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1.0 Introduction

- 1.1 This Statement has been prepared by Pro Vision on behalf of Ratesu Limited ('the Applicant') to support an application for the erection of 2no. receiver masts with antennae and associated infrastructure, parking and landscaping on land adjacent to Phoenix Park, Hurst ('the Site').
- 1.2 The proposed development is associated with a global system of ultra low latency network shortwave (HF) radio communications connecting international financial markets. In this case, the proposed infrastructure is required for trading through the London Stock Exchange.
- 1.3 The remainder of this Statement is set out as follows:
- Section 2 describes the site and its surroundings and the site's background;
 - Section 3 summarises the proposed development and explains its purpose and the specific operational requirements of the technology;
 - Section 4 considers the prevailing Development Plan context within which the planning application should be considered, as well as all other material considerations;
 - Section 5 sets out the planning balance and assesses the scheme proposal against the Development Plan having regard to other relevant material considerations before concluding the case for granting planning permission.
- 1.4 This Planning Statement should be read in conjunction with the relevant planning application forms, supporting plans and reports as detailed in the covering letter.

2.0 Site Context

The Application Site & Surrounding Area

- 2.1 The Site is adjacent to Phoenix Park, located between the village of Hurst and the M4 motorway. It is outside any defined settlement boundary and is therefore within the 'countryside' for planning purposes.
- 2.2 The Site area is approximately 0.38 hectares. It consists of part of an agricultural field, adjoining yard space and an access road.
- 2.3 Access to the Site is from the existing Phoenix Park entrance on Nelson's Lane.
- 2.4 Phoenix Park, comprising a mix of agricultural and commercial uses, is to the south of the Site. Adjacent to the Site boundary to the north, west and east is open farmland/paddocks. The remainder of the agricultural field, of which the Site is a part, lies to the south-east.
- 2.5 The Site is bound on two sides by established trees and hedgerow, separating it from the adjacent farmland/paddocks.
- 2.6 Beyond the immediate open farmland/paddocks is a wider landscape of similar character with dispersed clusters of residential properties and buildings serving agricultural and equestrian land usage.
- 2.7 The nearest residential properties are on Nelson's Lane approximately 100 metres from the Site to the south-east and to the north. Grange Farm, another rural commercial business park, is to the south-east on the opposite side of Nelson's Lane.
- 2.8 The Site is not covered by any statutory environmental or landscape designations. According to the Council's website, none of the trees on or within the proposed site boundary are identified as protected under a Tree Protection Order (TPO).
- 2.9 The Site is located within Flood Zones 1 and 2 for river flooding¹. The access road and an area within the northern part of the Site is within a medium risk area for surface water flooding (1 in 100-year event with climate change)².

¹ Environment Agency – Flood Map for Planning

² Environment Agency – Risk of Flooding from Surface Water dataset

- 2.10 The site is not covered by any statutory heritage designations. There are no listed buildings on the Site. The nearest listed building is the Grade II ‘Heriots’³ approximately 300 metres to the west. Hurst Conservation Area is approximately 1km to the north-west.
- 2.11 Wokingham Road Area of Special Character is between the Site and Hurst Conservation Area, approximately 500 metres from the Site. The Local Historic Parks and Gardens of Haines Hill, Hurst Lodge, Bill Hill Park and Billingbear are all between 1km and 2km from the Site.
- 2.12 No public rights of way pass through or border the Site. The nearest public right of way is approximately 250 metres to the east, a footpath⁴ leading south from Nelson’s Lane.
- 2.13 There is a high voltage power line with pylons running broadly east to west immediately south of the application site.

Planning History

- 2.14 Wokingham Borough Council’s online records contain the following planning applications relevant to the Site and wider Phoenix Park:
- 23725 Full application for the proposed erection of agricultural machinery and maintenance store. Approved 3rd March 2023. Relating to a building located close to the proposed Site boundary.
 - 221461 Full application for the erection of a building for commercial purposes within Class E(g) (Part retrospective). Approved 10th June 2022. Relating to premises within the adjacent Phoenix Park.
 - 191048 Prior approval submission for a proposed new road to access barn. Prior Approval not required 17th July 2019. This is a proposal for new access from Nelson’s Lane through an agricultural field adjacent to Phoenix Park. Planning consent has not been obtained for this road and there is no evidence to suggest this development has been undertaken.
 - 152140 Full application for proposed erection of an agricultural barn. Approved 5th October 2015. Relating to a barn immediately adjacent to the proposed Site boundary.

Environmental Impact Assessment

³ Historic England Listing ID 1117415

⁴ PRoW UID STNH13

- 2.15 The Environmental Impact Assessment (EIA) Regulations set out two categories of 'EIA development':
- 'Schedule 1 development', for which an Environmental Statement is required in every case; and
 - 'Schedule 2 development', for which an Environmental Statement is only required if the proposal is likely to give rise to 'significant environmental effects on the environment by virtue of factors such as its nature, size or location.'
- 2.16 The proposals do not fall under any development listed in Schedule 1 of the EIA Regulations and is therefore not 'Schedule 1 development'.
- 2.17 'Schedule 2 development' is development listed in Column 1 of Schedule 2 where either:
- Any part of the development is to be carried out in a 'sensitive area'; or
 - The development meets one of the relevant criteria or exceeds one of the relevant thresholds listed in Column 2 of Schedule 2.
- 2.18 A 'sensitive area' means:
- a) Land notified under Section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981;
 - b) A National Park within the meaning of the National Parks and Access to the Countryside Act 1949;
 - c) The Broads;
 - d) A property appearing on the World Heritage List kept under Article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;
 - e) A scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;
 - f) An area of outstanding natural beauty designated as such by an order made by Natural England under Section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000 as confirmed by the Secretary of State; or
 - g) A European site.
- 2.19 The site is not within, nor does it contain, any of the above designations. The site is therefore not within a 'sensitive area' according to the EIA Regulations.

- 2.20 The proposals do not fall clearly within any of the developments described in Column 1 of Schedule 2. Whilst it could be deemed infrastructure, and the schedule includes '*10. Infrastructure projects*', telecommunications infrastructure is not listed explicitly within this section. '*10(a) Industrial estate development projects*' and '*10(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas*' are the descriptions of development closest to the proposals.
- 2.21 In both instances, as a site of less than 1 hectare, the proposals fall far below the thresholds set within Column 2.
- 2.22 Considering the above, it is our view that the proposed development is not EIA development, and an Environmental Statement (ES) is not required.

3.0 The Proposed Development

- 3.1 The proposed description of development is: *'Erection of 2 no. masts with receiver antennae and associated infrastructure, parking and landscaping (temporary development).'*
- 3.2 One mast will be located to the rear of existing barns on scrubland in the western corner of the site. The other will be to the north-east, on what is currently the western corner of an open agricultural field.
- 3.3 Each mast will be approximately 51.5 metres high. Antennae will be fixed to both masts at heights of 30 metres and 50 metres, as well as two microwave dishes up to 600mm in diameter fixed at 48 metres.
- 3.4 The masts will be latticed (not solid), tapering from a width of approximately 3 metres at the base, to approximately 1.1 metres at the top.
- 3.5 The masts will be on piled foundations. Each mast will be within an 8 metre x 8 metre enclosure surrounded by a 2.4 metre high paladin security fence.
- 3.6 Two single-storey cabins are to be positioned against the rear wall of one of the barns; a 2.4 metre x 6.1 metre shipping container used for storage and a 3 metre x 4.9 metre prefabricated operations cabin.
- 3.7 A timber lean-to structure with corrugated sheet roof will cover the operations cabin, at the opposite end of the barn to an existing lean-to structure.
- 3.8 The structures will sit on bearers of approximately 0.3 metre above ground level.
- 3.9 The cabins will be within a compound surrounded by a 2.4 metre high paladin security fence. The compound and new access and parking area in front of it will be surfaced in a permeable shingle.
- 3.10 The proposal is for a temporary period of up to ten years. The masts and associated infrastructure would be removed after this period.

4.0 Specific Operational Requirements

- 4.1 The development is an innovative new form of advanced communications system supporting international communications involved in the global financial markets. The system is required to communicate with the target data centre in Slough.
- 4.2 Specifically, the development is for a High Frequency (HF) intercontinental radio communication system which provides vital communications technology for the financial sector and trading in the City of London, helping to keep it at the forefront of global trading. Without this technology, it is understood there is no other alternative facility in the UK at present, which risks the City of London falling behind its competitors.
- 4.3 In addition, the data centre in Slough (known as 'LD4') is the only London Stock Exchange data centre located outside of London. This data centre is where traders (the Applicant's clients) are located. Therefore, this location is best placed to provide these services, which in turn results in direct benefits to the UK through hundreds of millions of pounds annually in taxation, whilst the London Stock Exchange benefits through the volume of trades facilitated, leading onto wider benefits to the UK's financial markets and London's position as a global financial centre.
- 4.4 The Applicant seeks permission for the development for a temporary period of 10 years consistent with the typical lifespan of advanced communications systems.
- 4.5 Two masts are erected on the site to host three production antenna and one backup for resilience. This ensures that should one of the production antennae fail to operate correctly, the redundant antennae will ensure continuity of service. That continuity is critical for financial service operations where communications rely on immediate relay and the consequences of any delay or interference can be highly significant.
- 4.6 It is impractical to place the antennae on the same mast as it would require a height of approximately 90 metres to meet the technical requirements. Additionally, a larger mast would need to be stronger to resist wind loading and would subsequently be more visible from public views over a wider distance.
- 4.7 The masts are latticed and extend to approximately 50 metres in height, comprising of 9 no. 5 metre modules and 1 no. 5 metre base which includes the grillage interface joining the pile

foundations to the mast. The mast head is a component which allows the antenna to fix to the mast and is 1 metre in height and measures 3 inches wide, with flanged supports to prevent movement.

4.8 From ground level to the very tip of the mast head pole, the total structures are approximately 51.5 metres.

4.9 In summary, in order for the HF intercontinental radio transmission system to work effectively, a series of specific requirements must be met, including in terms of location. These requirements strongly influence where such facilities will be viable and feasible.

4.10 The key requirements are as follows:

- HF messages require directional antenna to be pointing in the direction of their source. For example, if messages are to be received from New York, the antenna must be angled directly at New York.
- The antenna needs to be at least 30 metres above ground level to ensure it can pick up messages and that these do not get blocked by interference from ground noise.
- Receiver antenna must be located in an electrically 'quiet' (i.e. rural) location, not within a noisy suburban or urban area where disruption from machinery, generators, street lights and magnetic devices can corrupt communications. The equipment must also be at least 5km to 10km away from any airports and emergency service stations (such as fire and police).
- The majority of masts for telecommunications equipment are not designed for such large antennae and would require significant changes to host multiple antenna to accommodate the technological and physical demands; including the need to prevent deflection from wind loading beyond the tolerance of the point-to-point microwave links.
- The technology cannot be operated on a shared mast as the HF messages could pick up other communications. The use of other technology on a shared mast could also corrupt HF messages received.
- Received messages are forwarded onto a data centre using a microwave point-to-point link, comprising of a small dish antenna at the HF receiving station and a corresponding dish at the data centre. The microwave link in this specific location needs to be at least 48

metres in height and be within a 20km visible line of sight to the data centre in Slough (LD4) to ensure it cannot be blocked or impinged upon by any buildings or objects such as woodland. Without a direct line of sight, the technology is unable to function properly and would need to rely on relay masts which would see more development and therefore likely result in greater visual and landscape harm in terms of openness and local character.

- A stable power supply and connection to the power grid is essential.
- A willing landowner (i.e. not all land can be assumed to be available for hosting masts).

4.11 The above demonstrates the specific locational and technical requirements to enable the technology to work. Therefore, the number of suitable sites is significantly limited; it is not flexible technology that can be placed anywhere.

4.12 An appreciation of these locational requirements is important in considering the suitability of the proposed site.

4.13 An assessment of suitable and available sites within 20km of the LD4 data centre in Slough is contained within the Site Selection Statement submitted alongside this application.

5.0 The Development Plan & Other Material Considerations

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The Development Plan

- 5.2 The Development Plan for proposals in Wokingham Borough comprise:

- Core Strategy Development Plan Document (2010)
- Managing Development Delivery Local Plan (2014)

- 5.3 The most relevant policies are listed below:

Core Strategy Development Plan Document (2010)

- CP1: Sustainable Development
- CP3: General Principles for development
- CP4: Infrastructure Requirements
- CP7: Biodiversity
- CP11: Proposals outside Development Limits (including countryside)

Managing Development Delivery Local Plan (2014)

- CC01: Presumption in Favour of Sustainable Development
- CC03: Green Infrastructure, Trees and Landscaping
- CC06: Noise
- CC09: Development and Flood Risk
- CC10: Sustainable Drainage
- TB21: Landscape Character
- TB23: Biodiversity and Development
- TB24: Designated Heritage Assets (Listed Buildings, Historic Parks and Gardens, Scheduled Ancient Monuments and Conservation Areas)
- TB25: Archaeology

- 5.4 Policy CP4 secures infrastructure requirements for the Borough. Although the thrust of the policy concerns the provision of infrastructure, services, community and other facilities to make other forms of development acceptable, the supporting text confirms that needs of utility suppliers such as telecommunications are included in the meaning of infrastructure⁵.

Other Material Considerations

- 5.5 Section 70 (2) of the Town and Country Planning Act 1990 requires that all material considerations are taken into account in planning decisions. Material Considerations include:

- National Planning Policy Framework (NPPF)
- Planning Policy Guidance (PPG)
- Supplementary Planning Documents (SPD) and other guidance including:
 - Landscape Character Assessment (2019)
 - Borough Design Guide SPD (2012)
 - Sustainable Design and Construction SPD (2010)
- Emerging Development Plan

National Planning Policy Framework (NPPF) 2024

- 5.6 The NPPF identifies that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7).
- 5.7 For decision-making, this means local planning authorities should approach decisions on proposed development in a positive and creative way, where decision-makers should seek to approve applications for sustainable development where possible (paragraph 39).
- 5.8 Paragraph 85 notes that planning decisions should help create conditions in which businesses can invest, expand and adapt. **Significant weight should be placed on the need to support economic growth and productivity**, taking into account both local business needs and wider opportunities for development.
- 5.9 Paragraph 87 sets out that planning decisions should recognise and address the **specific locational requirements** of different sectors, including making provision for data driven, creative or high technology industries.

⁵ Core Strategy Development Plan Document paragraph 4.27

- 5.10 Paragraph 119 states that ‘Advanced, high quality and reliable communications infrastructure **is essential for economic growth and social well-being**’. It goes on to explain that **planning policies and decisions should support the expansion of electronic communications networks**.
- 5.11 Paragraph 120 continues by stating that the number of radio and electronic communications masts and the sites for such installations should be **kept to a minimum** consistent with the needs of consumers, the effective operation of the network and providing reasonable capacity for future expansion. **Where new sites are required, equipment should be sympathetically designed** and camouflaged where appropriate.
- 5.12 Paragraph 122 sets out that applications for electronic communications development should be supported by necessary evidence to justify the proposed development, including:
- c) 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 and a statement that self-certifies that, when operational, International Commission guidelines will be met.
- 5.13 Paragraph 123 identifies that local planning authorities must determine applications on planning grounds only and **should not seek to prevent competition between different operators or question the need for an electronic communications system**.
- 5.14 Paragraph 131 notes that good design is a key aspect of sustainable development and helps make development acceptable to communities. Paragraph 135 sets out that planning decisions should ensure developments will function well and **are sympathetic to local character**, including the surrounding landscape setting.
- 5.15 Paragraph 207 states that applicants should describe the significance of any heritage assets affected, at a level of detail proportionate to the assets’ importance.
- 5.16 Paragraph 213 identifies that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, including (inter alia) grade I and II* listed buildings, and grade I and II* registered parks and gardens, should be wholly exceptional.

- 5.17 Paragraph 214 states that where a proposed development will lead to substantial harm to a designated heritage asset, consent should be refused unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 5.18 Paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 5.19 Paragraph 216 sets out that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Planning Policy Guidance (PPG)

- 5.20 The Government's planning practice guidance seeks to assist with how the National policy should be interpreted and applied. The following sections are considered to be most relevant to this application:

- Historic Environment (July 2019)
- Natural Environment (February 2025)

- 5.21 Historic Environment PPG Paragraph 007⁶ states:

'Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.'

- 5.22 Paragraph 009⁷ clarifies what assessment of the heritage impact should be included in an application:

'Applicants are expected to describe in their application the significance of any heritage assets affected, including any contributions made by their setting... The level of detail should be

⁶ Reference ID: 18a-007-20190723

⁷ Reference ID: 18a-009-20190723

proportional to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance.'

- 5.23 Paragraph 013⁸ clarifies what the setting of a heritage asset is and how it should be considered when making planning decisions:

'All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.'

- 5.24 The Natural Environment PPG includes guidance on how planning policies can conserve and enhance landscapes. Paragraph 036⁹ states this can include nationally and locally-designated landscapes but also the wider countryside.
- 5.25 Paragraph 037¹⁰ states that to demonstrate the likely effects of a proposed development on the landscape, a Landscape and Visual Impact Assessment (LVIA) can be used.

Other Supplementary Planning Documents (SPD) and Guidance

Wokingham Borough Landscape Character Assessment (2019)

- 5.26 A landscape character assessment has been prepared to provide a greater understanding of the landscape character of Wokingham Borough, to influence and inform policy and planning and management actions.

⁸ Reference ID: 18a-013-20190723

⁹ Reference ID: 8-036-20190721

¹⁰ Reference ID: 8-037-20190721

- 5.27 The Local Character Area (LCA) 'Hurst Farmed Clay Lowland' (LCA I4) is of particular relevance to the site. It is a flat predominantly pastoral landscape dominated by pony paddocks.
- 5.28 The small-scale field pattern and overgrown hedges result in an intimate character. Settlement is sparse, with post-war farmsteads and houses often hidden behind vegetation.
- 5.29 The boundaries of the character area are defined by field boundaries marking the transition from an intimate to a more open landscape.
- 5.30 The assessment gives guidance in relation to the Hurst Farmed Clay Lowland including:
- Conserve remnant standard trees within hedgerows.
 - Conserve and manage hedgerows.
 - Conserve and protect the small-scale pasture fields.
 - Maintain and enhance the character of enclosed rural lanes.
 - Enhance sense of place through careful design (including siting, massing, scale, materials and landscape – and sensitive lighting to retain dark skies at night) to minimise the impacts of any potential new development on valuable attributes, avoiding the introduction of visually prominent large-scale or vertical structures into this intimate scale landscape.
 - Protect the perceptions of rural tranquillity in the landscape, through the management of development.

Wokingham Borough Design Guide SPD (2012)

- 5.31 The aim of this document is to enhance the quality of development within the Borough. Some of its key objectives are:
- to respect and be sympathetic to the character of the area in which development is situated;
 - to minimise overlooking, loss of privacy, loss of amenity or over-dominance;
 - to take full account of the mass and height of development in relation to adjacent development and surrounding spaces; and
 - to ensure that new development meets the needs of its users.
- 5.32 The areas of highest landscape quality¹¹ within the Borough are identified as:

¹¹ Section 3B.3 Countryside

- the river landscapes surrounding the River Thames and Loddon;
- parts of the chalk landscape in the north of the borough; and
- much of the area of sand and gravel landscapes around Finchampstead and Farley Hill.

5.33 It states that development must respond positively to its site and local context, including topography and orientation of the site, existing natural and landscape features of value, heritage assets and their settings, the local settlement pattern and neighbouring properties¹².

5.34 Applicants are encouraged to engage with neighbours, the wider local community and other stakeholders and respond to issues raised through this process¹³.

Wokingham Borough Local Plan Update 2023-2040: Proposed Submission Plan

5.35 The Local Plan Update was submitted to the Secretary of State for examination on 28 February 2025. Although subject to potential modifications recommended by the Inspector, the policies attract some weight in the decision-making process¹⁴. The most relevant policies include:

- SS1: Sustainable Development Principles
- SS2: Spatial Strategy and Settlement Hierarchy
- SS5: Development in the Countryside
- **C7: Digital Infrastructure and Communications Technology**
- FD1: Development and Flood Risk
- FD2: Sustainable Drainage
- NE1: Biodiversity and Geodiversity
- NE2: Biodiversity Net Gain
- NE4: Trees, Woodland, Hedges and Hedgerows
- NE5: Landscape and Design
- DH2: Safeguarding Amenity
- DH5: The Historic Environment
- DH6: Archaeology
- HC5: Environmental Protection
- HC8: Noise Pollution
- HC9: Contaminated Land and Water.

¹² General Principle G1

¹³ General Principle G10

¹⁴ In accordance with NPPF (2024) paragraph 49.

5.36 Draft Policy C7 is of most relevance to the proposal. It includes criteria against which proposal for new digital and communications technology infrastructure will be determined.

- a) Minimise adverse impacts on local character, amenity, heritage assets, the quality of the public realm or pedestrian / highway safety;
- b) Explore innovative design and technology solutions, such as concealment/camouflage options, to minimise visual impact;
- c) Explore opportunities to make the most efficient use of existing telecommunication sites, such as mast sharing or use of existing buildings or structures; and
- d) Demonstrate no preferable alternative sites are potentially available which would result in a development that would be less visually intrusive.

6.0 Planning Assessment

- 6.1 This section addresses the planning consideration and planning balance, starting with the principle of development and progressing to consider all other material planning considerations.

Principle of Development

- 6.2 National policy has a presumption in favour of sustainable development. It also places significant weight on the need to support economic growth and productivity.
- 6.3 It supports the expansion of electronic communications networks, with an expectation that new sites are sympathetically designed and respect local landscape character.
- 6.4 The adopted Plan does not have a specific policy regarding telecommunications. Policy CP4 Infrastructure Requirements supports the provision of infrastructure, and in its supporting text, notes that telecommunications is one such type of required infrastructure.
- 6.5 Draft policy C7, can be afforded some weight noting that it has been submitted for examination. It is therefore relevant to assess the proposed scheme against its criteria for 'New digital and communications technology infrastructure'.
- 6.6 Addressing each criterion that are listed above in turn :
- a) The proposal is informed by a comprehensive set of technical reports, including landscape assessment, heritage assessment, flood risk and drainage, and ecology and tree impacts. Having identified the application site as suitable and available, these technical reports have shaped the proposed layout taking into account the nearest residential properties, trees and hedges and ground conditions. Selection of this location has involved avoiding designated landscapes, the Green Belt and other significant environmental protections, which in itself helps to minimise the impact of development (see criterion d as well).
 - b) Innovative design and technology solutions have been considered. The scheme is designed by experts in the telecommunications industry and understanding of the technological requirements for this specific form or communications technology.

Camouflage has been ruled out on basis that it impedes the functionality of the masts and risks operational failure as caused by the mast and antennae twisting over time. Whilst this can be a viable option for telecoms masts, which are less reliant on such precise lines of sight, it is not tolerable for the proposed scheme. Likewise, concealment is not an option for this technology that requires line of sight and minimal airwave interference.

- c) Sharing of other masts is also problematic, giving the specific technology involved and risk of interference. Even if capacity on an existing mast was identified and available, it would require line of sight and sufficient clearance from other antennae. However, the proposed scheme is making efficient use of the two masts proposed by sharing two antennae on each rather than proposing four separate masts with individual antenna, which would normally be preferable from an operational and performance point of view.

Two masts are proposed so that there is operational continuity in case of failure of one of the antennae.

- d) The application is supported by a Site Selection Report, which details the methodology the applicant has used to identify a suitable and available location. This included taking a 20km radius around the target data centre (LD4 in Slough), the maximum distance that would avoid multiple relay sites (with significant additional impact in the landscape), and assessing planning and environmental constraints. A refined area of search was identified in the south west of the search area. Together with considerations of the requisite line of sight and the 'quiet' environmental conditions, a suitable site was identified at Pheonix Park. Therefore, the proposed development avoids harm to designated landscapes, avoids impacting the openness of the Green Belt and avoids impacting environmentally protected areas. The proposed site is adjacent to commercial buildings, rather than open countryside, is in a relatively lowly populated area and is separated from the nearest residential properties by more than 100 metres and not within direct line of site of any residential properties.

6.7 Adopted policy CP11 is also relevant as the proposed location is in the countryside. Taking the criterion of the policy in turn:

- 1) Whilst not a rural enterprise, the proposed development is for an established business and will contribute significantly to the UK economy.

For the technical operational reasons explained, it requires a ‘quiet’ location, which rules out urban areas.

- 2) The development is carefully located close to the existing business park and therefore minimises encroachment into the open countryside. The masts are located with the curtilage of existing buildings at the park, contained by the defensible hedge boundary to the north, and the storage cabins are carefully located adjacent to an existing large barn, and therefore, will effectively be extensions to the building.

The existing road access through the business park will be used, helping to minimise the extent of urbanisation in this rural location.

- 3) It is not feasible for the masts to be located within existing buildings, but as noted above, the associated storage accommodation is provided as extension to an existing large barn, which avoids any new detached buildings in the countryside.
- 4) Not applicable as this is not a residential development.
- 5) Not applicable as this is not a residential development.
- 6) Not applicable as this is not an “essential community facility”.
- 7) Not applicable as this is not involving affordable housing.

6.8 As explained in the submitted economic statement, the proposed development is part of a global network of telecommunications between financial centres and will make a significant contribution to the UK economy, helping to keep the London Stock Exchange well connected to international financial markets.

6.9 Without this infrastructure, Ratesu’s ability to operate in the UK would be severely compromised and its customers would be severely affected, with negative impact on the London Stock Exchange, risking trading potential being lost to other international markets.

6.10 In principle therefore, the proposed temporary development is supported by national policy, accords with adopted policy CP4 and CP11 and draft policy C7.

Landscape

- 6.11 The sensitivity of the existing landscape to change and the changes arising from the development have been assessed by a qualified landscape professional¹⁵. The findings have informed the design, enabling the potential landscape and visual harm caused by the proposed masts to be mitigated.
- 6.12 At a regional level, the detailed site selection process within a 20km radius of the target data centre (Slough) has limited the magnitude of impact in the landscape, avoiding areas of designated landscape (including National Landscapes) and other environmental constraints. It also avoids inappropriate development in the Green Belt thereby preserving openness.
- 6.13 The proposal to use two masts in a single location, as opposed to a theoretical alternative of numerous relay masts, also helps to reduce impact in the landscape.
- 6.14 In respect of the local landscape, the physical presence of the masts would present an alteration to the landscape character in the immediate vicinity of the site, notwithstanding the presence of the high voltage power lines to the south, which already give an element of urbanisation. The localised changes include 'moderate and adverse' effects on the Hurst Farmed Clay Lowland LCA, as well as 'moderate/minor, adverse', and 'minor and adverse' effects on two adjacent LCAs. Beyond this, the landscape character would not be altered due to the extensive vegetation cover in the area.
- 6.15 The relatively open views of the masts from limited locations nearby mean that people within the immediate context of the site, residents or visitors to properties encircling the site, will be most affected by the physical presence of the masts. The impact on these receptors has been assessed as 'major/moderate and adverse'. The masts will also be visible to drivers on short stretches of the A321 to the west, where 'moderate adverse' effects will be experienced.
- 6.16 Beyond this immediate context, the level of effect diminishes as views of the masts become more limited. 'Minor, adverse' effects are expected on the village of Hurst and users of the M4, with views of the proposed masts possible in localised areas where visibility is not already obscured by existing buildings and trees.
- 6.17 Local visual impact is reduced by sharing the four antenna on just two proposed masts, which would otherwise require four masts to achieve the proposed service.

¹⁵ Abseline Landscape and Visual Appraisal

- 6.18 The proposed scheme is for a temporary period of 10 years therefore the visual impacts are not permanent. The masts and the associated infrastructure can readily be removed, returning the site to its original state.

Heritage

- 6.19 An assessment¹⁶ describing the significance of heritage assets affected by the proposals, including any contribution made by their setting, has been undertaken in accordance with paragraph 207 of the NPPF.
- 6.20 There are several designated heritage assets near to the site, including listed buildings and a conservation area. However, all have been found to be sufficiently physically and visually removed from the site, due to both separation distance and views being obstructed or heavily screened by topography and other built form.
- 6.21 Considering the above, the site does not form part of the surroundings in which the assets are experienced. The development would therefore not give rise to any loss of significance from any designated heritage assets.

Ecology and Biodiversity

- 6.22 The site has been assessed for the presence of, and suitability to support, protected and notable species¹⁷.
- 6.23 Although the site is within red risk zone for great crested newts, the limited extent of habitat loss means that it is highly unlikely they will be impacted. Precautionary methods of work are nevertheless outlined to minimise the risks during construction, including measures to avoid disturbance of nesting birds.
- 6.24 The development will lead to the loss of a small area of modified grassland and bramble scrub.
- 6.25 Retained grassland will be enhanced, and an area of mixed scrub will be created to the east of the site, providing suitable habitats for great crested newts, reptiles and other species.
- 6.26 Hedgerows on the site will be retained, and new native hedgerow will be planted in front of the security fence surrounding the compound.

¹⁶ The Environmental Dimension Partnership Ltd Heritage Assessment Ref: edp9263_r001c

¹⁷ Pro Vision Preliminary Ecological Appraisal

- 6.27 Overall, the development will result in a 17.87% net gain in habitat units and 15.38% gain in hedgerow units¹⁸, achieving the required 10% net gains for biodiversity on site.

Trees

- 6.28 No trees are to be removed. There is an adequate separation distance between existing trees and the masts to ensure their future sustainability. There will be no adverse impact on existing tree cover.
- 6.29 Where trees may be affected during construction, Root Protection Areas have been identified¹⁹. Tree Protection Fencing will provide full protection to all Root Protection Areas, except for 1) an area currently covered by hard surfacing, which shall remain in place throughout the works, and 2) areas where trees are set back sufficiently from the works.

Flood Risk and Drainage Strategy

- 6.30 The site is predominantly within Flood Zone 1 i.e. areas with the lowest probability of flooding from rivers. Part of the access road is within Flood Zone 2 on account of surface water flooding only²⁰.
- 6.31 Part of the site and the surrounding business park are shown on EA flood maps to be at risk from surface water flooding. The flood risk assessment from Calibro addresses this and concludes that this minor scale development will have negligible impact.
- 6.32 The access and parking area will be permeable. Only the ancillary storage/operations cabins, with a limited footprint of approximately 30 sqm, represent an increase in hardstanding. Discharge of rain to the ground has been found to be the most sustainable option with negligible impact on the behaviour of surface water runoff.

Contamination

- 6.33 A desk-based report by Landmark²¹ confirms there is no record of landfill, industrial processes or other historic land uses with the potential to contaminate land on the site. It further confirms that the site is not in a radon affected area.

¹⁸ Pro Vision Biodiversity Net Gain Assessment

¹⁹ SJ Stephens Associates Arboricultural Impact Assessment Ref: 2467

²⁰ Calibro Flood Risk Assessment and Drainage Strategy Ref: 25-248-60

²¹ Landmark Sitecheck Assess Ref: LOW-8799-5759-6921

Other local amenity considerations

- 6.34 The proposed development by its nature, receiver masts, is not a significant generator of noise. Details of the specifications of the associated equipment, including air cooling equipment, has been submitted.
- 6.35 Activity at the site, post-construction, will be very limited, requiring only routine or emergency maintenance by a small number of personnel at any one time.
- 6.36 There is no external lighting with the proposed development, therefore, no prospect of light pollution.
- 6.37 Notwithstanding these details which indicate low impact, there is a significant separation distance from the nearest residential receptors (nearest houses are more than 100 metres away).

Highways

- 6.38 The existing access through the business park will be used. No alterations are required to the junction with the public highway (Nelsons Lane), which already service the businesses in the park.
- 6.39 Traffic to the site will be very limited, with only routine or emergency maintenance involved., which typically involves one commercial vehicle and not HGVs.
- 6.40 A small area of parking is provided at the site for these vehicles. The development will not increase parking in the public highway.

Security and Safety considerations

- 6.41 The development is more than 100 metres from the nearest residential properties.
- 6.42 All equipment is stored in secure accommodation and will be monitored by CCTV.
- 6.43 Emergency access is available from the existing internal road through the business park.
- 6.44 The masts are a sufficient distance from the overhead power lines to the south of the site. They are designed to withstand severe weather conditions but in the event of collapse, they are constructed in sections and therefore unlikely to collapse as one complete structure.

Planning Balance

- 6.45 As detailed in the Economic Statement, the proposed development will provide considerable economic benefit for the UK economy, helping to support customer access to the London Stock Exchange thereby retaining trading potential and its benefits in the UK. Without this infrastructure, Ratesu would not be able to operate in the UK.
- 6.46 The telecoms development is a very high specification bespoke system (understood to be the only one of its kind in the UK at present), acting as a host platform and service provider serving multiple users, as opposed to a private infrastructure network.
- 6.47 This considerable economic benefit should be afforded significant weight in the planning balance. Similar economic benefits as these were noted in a similar development approved within the Borough at Bowsey Hill Saw Mill in recent years²².
- 6.48 Positive weight should also be given to the biodiversity net gain strategy, which exceeds the statutory 10%.
- 6.49 Suitable security and safety measures are provided.
- 6.50 Positive weight should also be given to the detailed site selection process, which has addressed the specific operational requirements of this specialised technology, and the efforts taken to avoid development in more sensitive locations in the region, including avoiding National Landscapes and inappropriate development in the Green Belt.
- 6.51 There is no specific adopted policy for the proposed development. Compliance with the development plan in respect of the key policies of CP4, CP11 and draft policy C7 attracts positive weight.
- 6.52 There would be harm to the local landscape, including the nearest residential properties, as set out in the LVA and summarised above.
- 6.53 This harm will be for a temporary period.
- 6.54 Limiting the scheme to two masts in a single location, avoiding multiple relay masts, limits this harm in the wider landscape.

²² Planning Application Ref: 230251

- 6.55 Careful design of the scheme, including locating the supporting infrastructure adjacent to an existing large barn on the edge of a business park, and relying on an existing access to the public highway, further reduces the visual impact and change in character in this rural location.
- 6.56 Beyond the local visual impacts, there is no significant impact on amenity, for example from noise, light or traffic. There is a significant separation distance (more than 100 metres) from the nearest residential properties.
- 6.57 As evidenced, there would be no loss of significance to any heritage assets.
- 6.58 There is a negligible impact on flood risk (surface water). A suitable drainage strategy is provided.
- 6.59 On balance therefore, the considerable economic benefits and importance of the infrastructure, and the specific operational requirements, and biodiversity benefits, is considered to clearly outweigh the identified harms to the local landscape, which are not permanent and can be remediated at the end of the planning permission.

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