

MEMORANDUM

From:	Stuart Ryder Landscape Architect Consultant		
Service	WBC Landscape and Trees	App No:	251385
Address:	Land Adjacent To Phoenix Park Nelson's Lane Reading RG10 0RR.		
Proposal:	Full application for erection of 2 no. masts with receiver antennae and associated infrastructure, parking and landscaping (temporary development).		
Type of Development:	Minor All other developments		
Site Visit Made:	Yes – to publicly accessible locations in vicinity		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☐ Request further information before determination as **stated below**
- ☒ Objection due to the reason(s) **stated below**

Comments On Proposal

Thank you for consulting us on Landscape and Arboricultural matters with regards to the above application.

Overview

The proposals have been considered in three parts – firstly a summary of the proposals, then arboricultural implications and lastly the wider landscape and visual impacts. There are no arboricultural implications of note but considerable landscape and visual effects would arise should the twin masts be built.

Summary of the proposals

The proposals boil down to the erection of two steel telecommunication masts, with associated horizontal antennae and short wave radio dishes. Their location is within a light industrial area – Phoenix Park off Nelson's Lane in the rural parish of Hurst. Their bases would be set within palisade security fencing 2.4m high.

The height of the masts is 50m, or up to 51.5m if the top platform of antennae are included in the height measurement. Two sets of the horizontal antennae platforms are fixed to each masts. In scaling from the Section and Elevation drawings these platforms appear to be 12m x 12m with vertical antennae reaching up 1.5m from them. The steel lattice work masts are positioned centrally to them.

Set towards the base of each mast is an anti-climb fan. Towards their tops at 48m above ground level are a pair of short wave dishes, 600mm in diameter.

A note on the elevation drawings explains that the masts would be in lattice steel work but subject to the final design recommendations of an Engineer. I take it that the elevational drawings are sufficiently accurate to represent the proposed masts. I also presume that they would be in a galvanised steel finish.

To allow the operation of the masts a cabin and steel shipping sized container would be placed within a fenced compound next to an existing building. A hedge would be planted around the fencing for amenity and ecological reasons.

Arboricultural implications

An arboricultural report prepared by S.J Stevens Associates is supplied with the Application and there are no arboricultural effects, either positive or adverse to take into account within the planning balance. The masts are set away from existing trees, tree protection fencing specified and there is no need to fell, or work on any tree stock. Arboricultural matters are not addressed further in this note as there are none to be considered.

Landscape baseline and effects

The Site is located within the I4: Hurst Farmed Clay Lowland as defined in the Wokingham Landscape Character Assessment 2019. It is not included in any Wokingham Area of Valued Landscape as defined in the September 2024 study.

The current Site is part of a light industrial complex set within a rural location with a series of businesses and workshops near the proposed mast positions. There is no heritage designation such as Conservation Areas, Listed Buildings or Scheduled Monument. Nor is there any Registered Historic Park or Garden in proximity to its location. Phoenix Park appears as a former farm, or rural enterprise centre that has spread in an ad hoc fashion in response to demand.

The wider rural area although pleasant in character terms does not benefit from any statutory landscape designation such as National Park or National Landscape. Unsurprisingly given its rural location it is not positioned in any Wokingham Area of Urban Landscape Value.

Mature trees and hedgelines around Phoenix Park appear to be the most notable landscapes asset and they contribute to the wider patterning of the same in I4 LCA. There are existing National Grid pylons in the area of typical appearance that run in an approximate east to west fashion over the north of the light industrial buildings. There is a pylon positioned in the north west section of the Phoenix Park.

A Landscape and Visual Appraisal (LVA) has been produced by Abseline Landscape Planning and is dated June 2025. It provides a summary of landscape effects in a Summary Table at §7.6 on pdf page 24. In reviewing the three landscape receptors listed in the table it struck me that all three were at a larger landscape character area scale rather than considering the landscape effects on the Site and its contextual area. It would be a more informative LVA if the landscape receptors of the Site and the Context to Site were included.

In considering the reported landscape effects the three identified receptors and reported effects have been digitally snipped and set below:

Receptor	Distance, Direction	Sensitivity	Magnitude	Level of Effect
Character areas				
WB I4 Hurst Farmed Clay Lowland	Includes Site	Medium	Large/medium	Moderate, Adverse
WB I1 Ashridge Farmed Clay Lowland	0.2km, south	Medium	Medium/small	Moderate/minor, Adverse
WB C2 Hurst River Terrace	0.5km, west	Medium	Small/negligible	Minor, Adverse

The assessors consider the landscape effect on the whole of the I4 Hurst Farmed Clay Lowland as **Moderate, Adverse**. No duration of effect is given but earlier in the LVA at 7.3.1 it is explained that,

‘The Proposed Development would be in operation for 10 years, which falls on the threshold of Medium-term and Long-term duration as set out in the assessment methodology. It would not result in a permanent change to the landscape.’

I agree that the effect would have a **Moderate Adverse and Medium to Long-term, Temporary** effect on LCA I4 which would remain for as long as the masts are in-situ.

I also agree that the scale of landscape or character effects diminish with distance and that the Abseline’s assessment of **Moderate/Minor, Adverse** and **Minor, Adverse** for LCA I1 – Ashridge Farmed Clay and C2 – Hurst River Terrace respectively are fair and reasonable.

However what also needs to be considered is the level of character change at the Site and within its context. I would assess these as detailed below;

Site – position of masts and control units

Landscape sensitivity = Low

Magnitude of effect = Large

Landscape effect = **Moderate, Adverse and Long-Term Temporary** for 10years.

Context to the Site – rural landscape area associated with Phoenix Park & Nelsons Lane

Landscape sensitivity = Medium

Magnitude of effect = Large

Landscape effect = **Major/Moderate, Adverse and Long-Term Temporary** for 10years.

In looking at the I4 descriptive text from the Wokingham LCA 2019 the following points appear most pertinent to the determining of this application whilst seeking to retain the character of the area.

Key Characteristics

- Pylons are mentioned in the description, visible in this open landscape that can be considered as presenting a precedent for the masts; and
- Peaceful rural landscape with an intimate character which the proposed masts would be seen in contrast to.

Valuable Landscape Attributes

- The intimate character of the small-scale pasture fields provides a distinctive sense of place - which the masts would appear in sharp contrast to the small-scale of landscape.
- A rural and tranquil landscape due to the settlement pattern of closely spaced farmsteads linked by a network of country lanes character with localised experience of dark skies – the masts would not add to this sense of rurality with their obvious manufactured form.

Landscape Condition

Listed as Good – the masts would not aid the continuation of this condition grading and would be judged as a detracting element in the landscape.

Key Issues

Many of the listed key issues are partly applicable to the Phoenix Park business facility as a whole within the rural landscape with the penultimate bullet point being directly relevant, it is set below with the reference to vertical development being the applicable to this application:

‘Increasing demand for large-scale agricultural buildings and vertical development e.g. pylons leading to visual intrusion of these elements.’

Landscape Strategy

The strategy for the I4 LCA is

‘to conserve and enhance the rural pastoral intimate character.’

The proposals would neither conserve or enhance the described rural pastoral intimate character and have been assessed by the Applicant as having a **Moderate, Adverse** effect on it for the duration of the masts’ presence within it. This is counter to the cited landscape strategy.

Landscape Guidelines

The last three guidelines appear the most pertinent to this application and they are set below as a digital extract.

- **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.
- **Minimise visual impact of commercial farm enterprises** through careful siting and design. Minimise visual clutter including signage.
- **Protect the perceptions of rural tranquillity in the landscape**, through the management of development.

These guidelines recommend:

- Avoiding the introduction of visually prominent vertical structures into this intimate scale landscape. The masts at 50m tall with horizontal antennae would be visually prominent vertical structures so should be avoided in this LCA.
- Phoenix Park was I suspect born out of the conversion of farm buildings like Grange Farm Units to the east and although not run as a ‘commercial farm’ the enterprise nature of its character would be further marked and visual intrusion increased if the masts are constructed.
- The perception of rural tranquillity within the landscape would be harmed by the two, tall masts that would appear at odds with the rural scene and other more ubiquitous electricity pylons in the area.

The proposals cannot be judged to follow these individual guidelines or when read as a whole.

Dark Skies

The topic of dark skies is raised for the I4 LCA. I have not found any reference to the need for red warning lights for aviation reasons to be fixed to the masts. Also I could not see any added to the nearby pylon but it was a daytime visit to Hurst. I do not anticipate the masts’ presence would alter the perception of rural dark skies in the area. This would not be the case if it later turns out that aviation warning lights are required as this would continue to mark their location in the rural landscape during the hours of darkness.

Visual receptors and effects

Visual receptors are also included in the LVA Summary Table at §7.6. They have been grouped together in six categories as snipped below:

Receptor	Distance, Direction	Sensitivity	Magnitude	Level of Effect
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Visual receptors				
Immediate context of Site	Includes Site	High/medium	Large	Major/moderate, Adverse
Rural area between 0.2km and 2.5km, north of M4	0.2km, east	High/medium	Medium	Moderate, Adverse
Rural area between the A321, M4/A329 (M) and B3030	0.3km, west	High/medium	Medium/small	Moderate, Adverse
Hurst	0.5km, north west	High/medium	Small	Minor, Adverse
A321	0.3km, west	Medium	Large/medium	Moderate, Adverse
M4	0.9km, south	Medium/low	Small	Minor, Adverse

There are eight representative viewpoints presented in the LVA with panoramic photography and illustrations of the masts in situ. I have not interrogated the production method of the illustrative images but have accepted them as fair representations of what the masts would look like.

I understand there was no agreement with Wokingham BC as to the particular viewpoints as presented and note that all the imagery is from late spring – May 12th 2025 and that no winter views (worst-case) are included within the LVA. These two points are recommendations of the Guidelines for Landscape and Visual Impact Assessments – Third Edition (GLVIA3).

However I found the illustrations useful to show the appearance of the masts in their setting from short, mid and long range views. I do not think it necessary for the Applicant to submit any additional ones at this time but winter views may be useful if the determination process elongates.

The viewpoint photography indicates that in closer views (VP's 1 & 2) that the masts are visually dominant, that in mid-range views (VP's 3 & 4) they are prominent and appear as tall structures visible above mature tree lines. In longer views such as VP 5 they are largely screened but would 'pop' into people's consciousness in longer views through gaps in the hedge network reminding them of their presence in the landscape. Other longer views (VP's 6 & 7) they are not evident but may come into views in winter months. The last VP8 I consider that the masts would not be visible in summer or winter months.

I consider the LVA's assessments of visual effects fair and reasonable with the **Major/Moderate and Adverse** effect closer to the Site decreasing to **Moderate, Adverse** visual effects further from the masts. There would be a highly notable and harmful visual effect in the vicinity of the Site. The duration of these adverse visual effects would be for the 10 years of operation which sits on the cusp of Medium and Long term duration in human perception terms.

A point that is raised here is whether the masts would be removed in 10 years' time or whether a subsequent application would seek to extend the duration of use if alternative technologies have not replaced the commercial need for the masts. Also the matter of their removal in case the Applicant ceases trading is raised.

Data masts and Electricity Masts

A number of points are raised in connection to the visual appearance of these two types of masts that would appear in proximity to each other;

Cumulative visual effects – The LVA at 1.4.6 and 1.4.7 explain that they consider cumulative effects are only for those development in planning stage and not yet built saying that existing similar features contribute to the existing baseline. This is one approach that can be taken but I still find it useful to consider ‘compounded’ visual effects i.e. does there appear to be a lot of them in any given view? VP1 would be one example of this where there would be a high number of tall structures within the view.

Similar but different – The precedent of electricity pylons within the area introduces similar lattice work structures but they have interconnecting transmission lines and are spaced at regular intervals. The masts have the horizontal antennae adding a degree of unusualness and their close proximity to each other will mark them as something different to the more ubiquitous and evenly spaced electricity pylons. The masts’ purpose and reason for being in the landscape would not be understood adding to their notability in perceptual terms.

Mitigation – There is no effective screening mitigation for pylons and these masts given their height and the number of broader viewing opportunities to them.

Landscape Policy Consideration

Core Strategy(CS) Policies

There are three CS policies typically reviewed with their landscape content or context as summarised below;

- **CP1 – Sustainable development** – landscape is part of the broader aim of maintaining or enhancing the high quality of the environment and the proposals should not fundamentally alter the quality of the local landscape – **conflict is found**;
- **CP3 – General Principles for development** – with landscape explicitly referenced in sub-point c) which requires ‘*no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses.*’ the important landscape features of intimate, rural landscape would experience detrimental effects of between Major/Moderate, Adverse near to the Site and Moderate, Adverse within the wider I4 LCA. Sub-point f) also requires consideration in terms of the ‘*use of appropriate landscaping*’ in this sense this means planting and hard landscape treatments. In this case there is no mitigation that can be associated with the masts but there is some planting around the control kiosks - *There is **conflict** with the landscape aspect of this policy.*
- **CP11 – Proposals outside Development Limits (including countryside)** – seeks ‘*to protect the separate identity of settlements and maintain the quality of the environment*’ with both these objectives have clear landscape and visual dimensions - *The proposals are in **conflict** with maintaining the*

quality of the environment part of these objectives but would not threaten the separate identity of any settlements. Nor do they contribute and/or promote recreation in, and enjoyment of, the countryside

Managing Development Delivery (MDD)

With regard to the MDD three policies are generally seen to have a landscape dimension:

- **CC02 – Development Limits** – Not applicable in this situation;
- **CC03 – Green Infrastructure, Trees and Landscaping** – relates to the form of design proposals and sub-parts 2d) & 3) of the policy are pertinent to these proposals. There is the small scale planting around the control kiosks – *there is the potential to comply with this Policy subject to the satisfactory discharge of typical landscape conditions*; and
- **TB21 – Landscape Character** – is directly applicable to the principal of whether the proposals can be accommodated at this location and both sub-parts of this policy require consideration. The first part is whether the Wokingham Landscape Character Assessment has been taken into account has been followed by the submitted LVA by Abseline Landscape Planning, *‘Proposals shall retain or enhance the condition, character and features that contribute to the landscape.’* To this end the masts do not retain the character of the local landscape and by the Applicant's own assessment lead to a Moderate, Adverse effect for the 10 year duration of operation. *There is compliance with the readily achievable first part of the policy but clear conflict with the second part that considers effects on landscape character arising from the proposals.*

NPPF

- **NPPF Sections 15** – which amongst other matters includes Paragraph 187 b) on the intrinsic qualities of countryside – *The proposals are in conflict with the recognition of the intrinsic qualities of this part of the local countryside.*

Conditions & Reasons (if required)

Should you decide to grant Planning Consent if the objections I raise are outweighed by the benefits of the proposals then the following landscape focussed planning conditions should be applied.

Landscaping

Prior to the commencement of the development there shall be submitted to and approved in writing by the local planning authority a scheme of landscaping, which shall specify species, planting sizes, spacing and numbers of trees/shrubs to be planted, and any existing trees or shrubs to be retained.

Planting shall be carried out in accordance with the approved details in the first planting and seeding seasons following the occupation of the building(s).

Any trees or plants which, within a period of 10 years from the date of the planting (or within a period of 10 years of the operation of the equipment in the case of

retained trees and shrubs) die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species or otherwise as approved in writing by the local planning authority.

Reason - *To ensure adequate planting in the interests of visual amenity. Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21 (and TB06 for garden development).*

Retention of trees and shrubs

No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the written approval of the local planning authority. If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted at the same place, unless the local planning authority gives its written consent to any variation

Reason - *To secure the protection throughout the time that development is being carried out, of trees, shrubs and hedges growing within the site which are of amenity value to the area. Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21.*

Protection of trees

a) No development or other operation shall commence on site until an Arboricultural Method Statement and Scheme of Works which provides for the retention and protection of trees, shrubs and hedges growing on or adjacent to the site in accordance with BS5837: 2012 has been submitted to and approved in writing by the local planning authority. No development or other operations shall take place except in complete accordance with the details as so-approved (hereinafter referred to as the Approved Scheme).

b) No operations shall commence on site in connection with development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening or any other operation involving use of motorised vehicles or construction machinery) until the tree protection works required by the Approved Scheme are in place on site.

c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within an area designated as being fenced off or otherwise protected in the Approved Scheme.

d) The fencing or other works which are part of the Approved Scheme shall not be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery and surplus materials removed from the site, unless the prior approval in writing of the local planning authority has first been sought and obtained.

Reason - *To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of amenity value to the area, and to allow for verification by the local planning*

authority that the necessary measures are in place before development and other works commence Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21.

Licence for operation of mast

That the duration of operation for the mast and associated equipment is a maximum of 10 years before re-submission of materials to replace or continue the operation of the mast and associated equipment. The licence is to include means both financial and physical for removal of the masts on cessation of trading by the Applicant.

Reason – To protect local landscape character by placing a maximum number of years of operation in line with the broader planning application and in the case of business cessation.

Date:

25/7/25

Signed:

Stuart Ryder