

Upgrading of Radio Base Station at Army Reserve Centre, (Former TA Centre) Brock Barracks, Oxford Road, Reading, RG30 1HW

Planning & Heritage Impact Statement



Front View of Brock Barracks Keep & Entrance Gateway off Oxford Road Taken from Google Street view for illustrative purposes only)

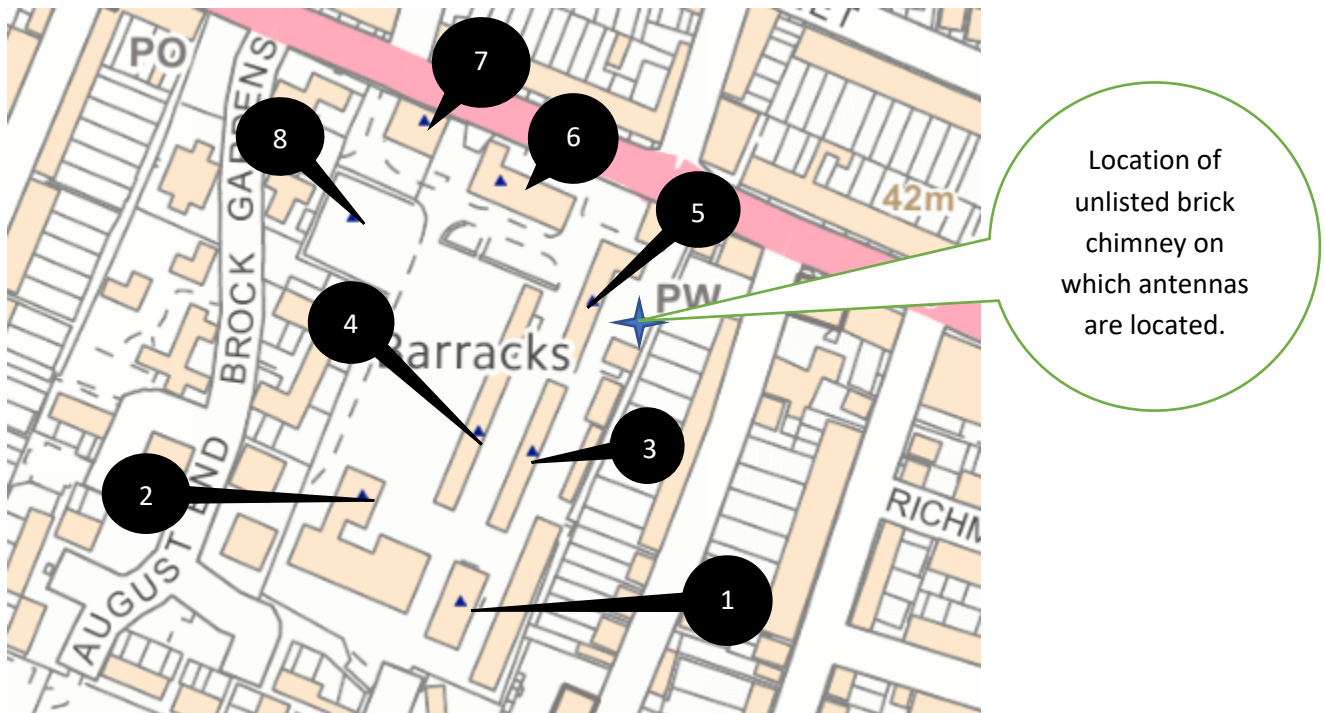
Heritage Assets

This statement refers to the following heritage assets which make up the Brock Barracks. Whereby most of the buildings are individually listed, those not specifically listed are afforded the same protection under the Planning (Listed Buildings & Conservation Areas) Act 1990 (as amended) as being within the defined curtilage of Brock Barracks and the statutory listed buildings which comprise it.

Brock Barracks Buildings: Listing Entry Numbers:

1. Former Hospital: (352639) Grade II
2. Former Sergeant's Quarters: (352641) Grade II
3. Anson Barrack: (352638) Grade II
4. Tofrek Barrack: (352643) Grade II
5. Former Married Quarters: (352640) Grade II
6. Officers' Quarters & Mess: (352642) Grade II
7. Keep, Attached Walls & Gateway: (134320) Grade II
8. The Royal Berkshire Regiment Cenotaph (299195) Grade II*

The figure below indicates the position of the various statutory listed buildings described above and annotated accordingly within the curtilage of the barracks and the position of the unlisted brick chimney which accommodates the existing and proposed antennas and cable tr



Map of Barracks & Building Locations within Curtilage (English Heritage website)

Definition: Curtilage

Curtilage can be defined, for the purposes of the listed building legislation, as an area of land around a listed building within which other buildings pre-dating July 1948 may potentially be considered listed. Not all buildings will have a curtilage. With those that do there will be cases where the extent of the curtilage will be clear (such as a garden boundary) but in others it may not be as clear each case will always be a question of fact and degree. A decision taker may take the following factors into account in assessing the matter: i) the physical layout of the listed building and the building; ii) their ownership past and present; and their use or function past and present specifically whether the building was ancillary (i.e subordinate to and dependent on) the purposes of the listed building at the date of listing.

In terms of the listing of the buildings most are Grade II listed and of a similar date and style, representative of their military heritage and use, they are of 2- 3 storeys high, mainly red brick construction and traditional design with pitched and hipped roofs. Of particular note however is the Royal Berkshire Regiment Cenotaph located to the north western corner of the curtilage, behind the Keep which fronts Oxford Road. This structures is listed Grade II* and is described in its listing as follows: *"The Royal Berkshire Regiment Cenotaph, situated at Brock Barracks, Reading, is listed at Grade II* for the following principal reasons: * Historic interest: as an eloquent witness to the service of the Royal Berkshire Regiment and the sacrifices it made in the conflicts of the C20; * Architect: by the nationally renowned architect Sir Edwin Landseer Lutyens (1869-1944), who designed 58 memorials at home and abroad including the Cenotaph in Whitehall; * Design quality: a simple yet elegant stone cenotaph with painted stone flags, based on the Whitehall Cenotaph; * Group value: with the adjacent buildings of Brock Barracks listed at Grade II."*

The Cenotaph can be seen below in this view from Brock Way, it is the white structure located to the right of the Keep. It is noted that from this glimpsed view from the more modern residential properties constructed to the western boundary of the barracks that very tall mature trees located on the western boundary of the site provide screening in views from this direction towards the chimney which is located due east of the Cenotaph.



View towards Brock Barracks from Brock Way Taken from Google Street view for illustrative purposes only)

The red brick chimney within the barracks site is located on the eastern boundary of the site, adjoining the rear gardens of the terraced houses fronting Wilson Road. Whilst the chimney itself is not on the statutory list, it is afforded protection as being located within the curtilage of the barracks, which is very well defined and landlocked by adjoining residential development of both traditional and modern design to the east, west and south. The Keep, entrance walls and gated entrance and Officers' Quarters and Mess form the northern boundary with a frontage to Oxford Road.

Due to the landlocked nature of the barracks, the surrounding townscape and mature trees within the curtilage of the site, views of the chimney are limited to that across a gap site on Wilson Road close to its junction with Oxford Road, as illustrated in the photograph below



View of Chimney from Oxford Road (Taken from Google Street view for illustrative purposes only)

The Proposal

At present the chimney accommodates 3No. Vodafone antennas, on its northeast, southeast and western elevations. An existing ground based cabin is located between the chimney and boundary wall of the barracks compound, with a small meter cabinet located adjacent. A cable tray containing the feeder cables extends from the cabin, along its flat roof, then along the base of the chimney wall to its west elevation then extends up the west elevation to the antennas located at a height of 13m to 15m (top of the chimney). The existing antennas are facemounted to the chimney brickwork and they and the cable tray are painted to match the brickwork background to camouflage them and further reduce contrast and their visual impact.

It is proposed as part of the 5G upgrade of this base station to remove the existing antennas and replace them with a total of 6No. antennas, spaced equidistant around the circumference of the chimney at an underside height of 12.9m (above course banding detail). Three of the antennas will extend from this underside height to the top of the chimney, whilst the other three antennas will be much shorter in length with an underside at 14.2m, extending again to the top of the chimney.

The new antennas will be fixed to the brickwork using a steel plate bolted to the brickwork with a 100mm pole to which the antennas are fixed. Whilst not directly facemounted to the brickwork, the very short length of the pole will give the appearance that they are facemounted from the more distant public views. This engineering solution is required due to the weight and increased number of the antennas and to minimise damage to the brickwork, thereby safeguarding the chimney's structural integrity and minimising damage to its fabric. The antennas will be painted out to match the brickwork, similarly to the existing.

An additional 300mm wide cable tray is proposed to extend from the equipment cabin, across its roof and follow the line of the existing cable tray up the west elevation, it will run parallel to and adjoining the existing cable tray and again be painted out to match the brickwork. This additional cable tray is required to accommodate the additional feeder cables for the three new antennas. Additional equipment will be located internally within the existing cabin.

Assessment of Proposal

Planning Policy Context

National planning policy is contained within National Planning Policy Framework (2019) in terms of both the support for digital connectivity within section 10 and the impact on the heritage assets within section 16.

National Planning Policy Framework

National planning guidance on electronic communications in England is contained in Section 10 of the National Planning Policy Framework (2019), entitled 'Supporting high quality communications'. The framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile telephony (such as 5G) and full fibre connections.

The NPPF confirms 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 efficient operation of the network, and providing reasonable capacity for future expansion. The use of existing masts, buildings and other structures for new electronic communications capability should be

encouraged, where new sites are required these should be sympathetically designed and camouflaged where appropriate.

Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose Article 4 Directions, or insist on a minimum distance between new electronic communications development and existing development.

Applications for new electronic communications development should be supported by information on alternative siting and design options considered, consultation undertaken, design and siting rationale and an ICNIRP declaration. In determining applications local planning authorities must base their determination on planning grounds only, and should not prevent competition between different operators, question the need for the development, nor set different health standards to the ICNIRP guidelines.

National Planning Policy Framework relation to policy for conserving and enhancing the historic confirms:-

“192. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

194. 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, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

196. 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 including, where appropriate, securing its optimum viable use.”

Planning Practice Guidance: Conserving & Enhancing the Historic Environment

“Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use to as yet undiscovered, undesigned buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time.

Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.”

Local Plan Policy

The Reading Local Plan for the purposes of this proposal and site currently comprises the Adopted Core Strategy (Jan 2008, altered 2015), the Adopted Sites and Detailed Policies DPD (Oct 2012, altered 2015) and the Proposal’s Map (2012). The relevant policies are CS7 (Design & the Public Realm) and CS33 (Protection and Enhancement of the Historic Environment) from the Core Strategy and DM21 (Telecommunications Development) from the Detailed Policies DPD. There are no specific other landuse designations on the site, other than the statutory listing of the buildings within the barracks compound.

The emerging local plan is at an advanced stage, with consultation on the Examination Main Modifications ending in July 2019 and the responses sent to the Inspector for consideration. Policy OU3 relates to telecommunications development and is similar in its provisions to current adopted policy DM21, with an added provision to give due consideration to the impact of any such development on heritage assets. Accordingly the weight to be attached to this policy for the determination of these applications is significant.

Assessment

The chimney is not listed, but makes a contribution to the interpretation of the age and use of the barracks as a military facility, in terms of both the residential, community and associated industrial activities that would have been undertaken within the site. It in itself however, is not of any particular architectural significance in terms of its design, fabric, or construction, nor at 15m in height does it have any prominence in terms of its location within the wider barrack compound and setting. The existing views of the compound, including the taller elements within it such as the chimney are very well contained due to the nature of the surrounding townscape and the fact that it is land locked with

a frontage to Oxford Road, which is also screened by high boundary walls. As such the siting of the equipment on this non-listed structure of lesser value and screened by contained townscape and very tall trees within the barracks is such that it does not detract from the historic nature, character and appearance of the barracks, or its wider setting.

Whilst the upgrading of this installation requires additional antennas and slightly wider antennas than that currently installed on the chimney and additional cable tray to accommodate these, it is not considered that given the above reasons that this will result in a substantial level of visual harm to the building. The design solution seeks to keep the antennas as close to the chimney façade as possible, without significantly damaging the fabric, so that in the event of redundancy and removal, damage to the fabric is minimised and the structural integrity of the chimney is safeguarded. The camouflaging of the cable tray and antennas to match the brickwork will reduce contrast with the immediate background and reduce visual impact as far as practicable, thus retaining the character and appearance of the chimney as such, rather than appearing as a host structure for telecommunications apparatus.

Given the surrounding nature of the townscape, no better siting and design options exist to accommodate the upgrade of the operator's network to 5G capability, as no other tall buildings or structures of a suitable elevation and design are available within the target coverage area, nor are there any locations suited to a new ground based mast. The current proposal, despite the increased visual impact remains the best location and design possible to meet the technical and operational needs of the development whilst minimising visual impact on the wider area. It is therefore considered to be compliant with the provisions of Policy DM21 and section 10 of NPPF. The design criteria within Policy CS7 require lesser weight as these relate in a generic sense to all development and do not take account of the specific technical and operational requirements of telecommunications development, and as such greater weight requires to be given to Policy DM21. That said however, it is considered that the development does not pose any contention with these general design elements in CS7 as they relate to the development and its impact on the character and appearance of the wider area.

It is acknowledged that the development will result in further visual harm, however the difference between the existing development and that proposed is not significant, and neither is the harm considered to be substantial.

Balance in planning must be struck between the benefits of the development and any less than substantial harm to the historic environment and it is considered in this instance the benefits of upgrading the existing telecommunications equipment outweigh any impact on the setting of the individually listed buildings within the barracks, or the barracks compound terms of its cultural and historic contribution to this part of Reading.

It is considered that the character and appearance of the chimney and its setting would not be adversely impacted to an unacceptable degree when the benefits of 5G network coverage for this area of Reading are weighted against the less than substantial harm caused. It must be remembered that if redundant the equipment could be removed without any great detriment to the chimney and as such its historic character and appearance would then be preserved. It is contended that given the historic and cultural character and appearance of the barracks is not adversely impacted by the development that no great contention exists with Policy CS33 which seeks as a minimum to preserve such heritage assets.

Furthermore the consideration of impacts on heritage assets as part of emerging policy OU3 within the new local plan is such that no policy conflict is envisaged with the emerging replacement development plan.

It has been demonstrated that in accordance with NPPF, the less than substantial harm arising from the development is outweighed by the social and economic benefits enhanced digital connectivity would bring in terms of a 5G network allowing various SMART city applications for residents, businesses and visitors within this part of Reading.

It is hoped that the Council will take a favourable view of this proposal, in its overall impact on the character, and appearance of the chimney and wider barracks, and its contribution to the historic environment and to approve the full planning and listed building consent applications as submitted.

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On Behalf of Cornerstone Ltd

Date: 29th August 2019