

APP/X0360/C/25/3374730 - Land at Gravelley Bridge Farm, RG7 1LG

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The appeal site *Land at Gravelley Bridge Farm, Grazeley Green Road, Grazeley, Reading, RG7 1LG* is within the Detailed Emergency Planning Zone (DEPZ) for the Atomic Weapons Establishment (AWE) site at Burghfield. The site is additionally within the Urgent Protective Action (UPA) area. The appeal is regarding: 'Without planning permission, the material change of use of the Land to a shooting club facility (Sui Generis) and unauthorised operational development (erection of fencing, hardstanding and buildings) and engineering operation (creation of bunds).'

I understand there is no previous approved planning application on site, and as such, no full back position. Therefore, I'm assessing this in the same way I would if this was a new, unbuilt development.

1. Policy

1.1 Paragraph 102 of the NPPF states:

"Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

a) anticipating and addressing possible malicious threats and other hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security. The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development; and

b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

1.2 Policy TB04 (Development in vicinity of Atomic Weapons Establishment (AWE) Burghfield) of the Wokingham Borough Adopted Managing Development Delivery Local Plan (February 2014) states:

1. Development will only be permitted where the applicant demonstrates that the increase in the number of people living, working, shopping and/or visiting the proposal (including at different times of the day) can be safely accommodated having regard to the needs of "Blue light" services and the emergency off-site plan for the Atomic Weapons Establishment site at Burghfield.

2. The applicant will need to provide this information where the proposal exceeds the scale of development detailed below for the consultation zone as defined on the Policies Map.

- 1.3 Similarly, Policy HC10 (Development in the vicinity of Atomic Weapons Establishment (AWE) Burghfield) of the Wokingham Borough Council Draft Local Plan (February 2020) states that:

“Development will only be permitted where it is demonstrated that the increase in the number of people living, working, shopping and/or visiting the proposal (including at different times of the day) can be safely accommodated having regard to the needs of the responding agencies detailed in the West Berkshire Council’s AWE Off-Site Emergency Plan (OSEP) for the Atomic Weapons Establishment”

- 1.4 Therefore, as this proposal results in *one or more additional persons working and visiting the DEPZ*. The appellant is required to demonstrate how the development can be safely accommodated within OSEP - having regard to these policies.
- 1.5 The applicant had submitted no information in relation to this, however limited information has since been submitted in the Statement of Case, which I refer to in Section 3.

2. Detailed Emergency Planning Zone (DEPZ) and AWE Off-Site Emergency Plan (AWE OSEP)

- 2.1 The expansion of the DEPZ in 2020, as a result of legislation changes, has resulted in significant challenges to all responding agencies capabilities should there be a nuclear emergency arising from the Atomic Weapons Establishment, Burghfield. There are legal requirements placed on responsible agencies and the AWE OSEP in ensuring that it can accommodate all those within the DEPZ in relation to their health, safety and welfare. Resources for response and recovery are finite. Any additional population increase would lead to a degradation of these existing capabilities, therefore not only place those in any new development at risk but the existing population in the area.
- 2.2 The Office of Nuclear Regulation finding’s from a statutory multi-agency exercise held in 2023, recognised the pressures on the OSEP and the impact on the practical implementation of the OSEP, including the following:
- Arrangements for monitoring for radioactive contamination on or in members of the public as a result of an emergency’ (and associated decontamination), known as contamination monitoring.
 - Arrangements relating evacuation holding areas for displaced persons awaiting contamination monitoring.
 - Arrangements for managing the numbers and scale of displaced people, both those outside the DEPZ and unable to return home for any period of time and those inside the DEPZ who require evacuation; and
 - Arrangements for managing those who self-evacuate, especially for ensuring they undergo appropriate contamination monitoring and decontamination.
- 2.3 This position is consistent with that detailed in the recent appeal decision: APP/H1705/W/23/3326959 (Land at 1-9 Shyshack Lane), where the arguments made by West Berkshire District Council, Basingstoke and Deane Borough Council, and the Office for Nuclear Regulations were upheld by the Planning Inspector:

“Although such an increase would be comparatively small, it is recognised that the plan is not infinitely scaleable. An increase in population would increase the need for, and demand placed upon, emergency responders, reception centres, rest centres

and radiation monitoring exacerbating the difficulties of delivery emergency care in a complex multi-agency emergency.”

“...the key purpose of the REPIR to reduce exposure during a radiation emergency through the effective deployment of the OSEP.”

“...the result in incremental development that would over time significantly erode the effective management of the land use planning consultation zones surrounding the AWE to the disbenefit of public safety. The proposed development would place a greater burden on the OSEP, which is already under pressure based on the comments of the ONR [Office for Nuclear Regulation].”

2.4 In the case of Land east of Hayes Drive and north of Church Lane (APP/X0360/W/24/3354607), this appeal was dismissed by the Minister of State for Housing and Planning, on behalf of the Secretary of State (SoS) in September 2025. Substantial weight was applied to the unacceptable risk of harm to the safety and wellbeing of future residents of the proposed development and the wider public. I've summarised the main conclusion from the SoS and Inspector:

1. Unacceptable Risk to Public Safety and Wellbeing

- Although the likelihood of a radiation emergency is very low, the consequences could be significant.
- The Secretary of State agreed with the Inspector that:
 - Even low radiation doses could cause psychological harm and anxiety.
 - In an emergency, Blue Light services and public agencies would be under greater strain due to increased population.
 - The appellant failed to provide quantitative evidence that emergency services could cope without affecting other duties.
 - The proposed monitoring stations did not meet planning condition tests and would not mitigate the risks.

3. Pressure on the Off-Site Emergency Plan (OSEP)

- The OSEP is already under significant pressure due to cumulative development within the DEPZ.
- The appeal scheme, combined with approximately 301 consented but unbuilt units, would unacceptably add to this pressure.
- The Secretary of State gave great weight to the Office for Nuclear Regulation (ONR) witness's professional view that they had no confidence in the adequacy of the OSEP.

4. Threat to National Security and AWE(B) Operations

- AWE(B) is critical to UK defence policy and the delivery of the Continuous at Sea Deterrent (CASD).
- If the ONR were to declare the OSEP inadequate, AWE(B) could be prevented from operating, with serious consequences for national security.
- The Secretary of State agreed that:
 - The proposal would pose an unacceptable risk to the future capability and capacity of AWE(B).
 - This conflict with MDD Policy TB04 and national planning policies (Framework paragraphs 102(b) and 200) carries very substantial weight.

5. Conflict with Local Planning Policy (MDD Policy TB04)

- Policy TB04 requires that development within the DEPZ must demonstrate it can be safely accommodated with regard to emergency services and the OSEP.
- The Secretary of State concluded that this test was not met.
- The proposal would increase the number of people requiring protection in an emergency, without assurance that the OSEP could accommodate them safely.

6. Precedent and Cumulative Impact

- The Secretary of State acknowledged concerns that allowing the appeal could set a precedent for further development in the DEPZ.
- Incremental, unplanned development could erode the effectiveness of emergency planning and public safety.

2.5 There are further recent appeals, all with small increases in the population that have been refused by Inspectors. For example:

- 25 Heath End Road Appeal (Appeal Ref: APP/H1705/W/24/3345746)
- Benham's Farm Appeal (Appeal Ref: APP/W0340/W/24/3342596)
- Land approximately 150 metres south of Brimpton Lane and west off Blacknest Lane, Brimpton Common (Appeal Ref: APP/W0340/W/24/3346878)
- Recreation Road Appeal, (APP/W0340/W/24/3344580)
- Sunnyside Village Stores Appeal (APP/W0340/W/24/3343072)

These Inspectors' decisions highlighted several concerns, for example public safety and the cumulative and adverse impact developments, including small, can have on the DEPZ & OSEP.

2.6 APP/X0360/W/22/3304042 (Land West of Kingfisher Grove) is often referred to by applicants as an example of why development should be permitted in the DEPZ, but it should not be. Representations were only made by the Council's Emergency Planning Manager, so the Inspector did not have the objections and detailed arguments from other critical agencies from the Off-Site Planning Group before them – including West Berkshire Council, the Office for Nuclear Regulation and the Atomic Weapons Establishment, alongside the Ministry of Defence.

2.7 The Inspector also made clear in their report that "Given its bespoke circumstances, I do not consider that it would result in the creation of a precedent for allowing other development in the DEPZ that in any case must be assessed on its own merit" (para. 21). Therefore, it is clear that this decision does not set a precedent for this appeal, or for any future applications within the Detailed Emergency Planning Zone.

2.8 Similarly, APP/W0340/W/22/3312261 'the Hollies' is referred to by applicants. However, the Inspector said the AWE "OSEP is not infinitely scalable and that incremental, unplanned development could, over time, erode the effective management of the land use planning consultation zones and be detrimental to public safety. In that sense, I agree with the Inspectors in the Shyshack Lane appeal, the Benham's Farm appeal and the 132 Recreation Road appeal. However, such concerns do not arise in the present case due to the fact that the appeal site is the only remaining allocated site within the DEPZ. As such, the circumstances of this appeal are unlikely to be repeated elsewhere in the DEPZ."

2.9 The Hollies was an allocated site prior to REPP19, and expansion of the DEPZ, this site is not.

3 Impacts on the OSEP from the proposed development

- 3.1 This site is within a densely populated sector of the DEPZ, with Spencers Wood and Three Mile Cross to the east of this development. These areas already contain large populations, busy roads, large numbers of commercial units and pre-existing vulnerable sites (e.g. schools, caravan parks and care homes), so the concerns listed in 2.2 are applicable here.
- 3.2 The list below is as an example of the type of issues this development would impact upon:
- a. Addition of population required to shelter
 - b. Increased number of individuals that may need support from services during sheltering period
 - c. Increase in numbers that may require self- or mass decontamination
 - d. Increase in number that require access to Radiation Monitoring Unit in order to undertake personal monitoring for radiation contamination and therefore assurances.
 - e. Increase in number that may require relocating – including immediate short term at assistance centres with limited resourcing and locations available,
 - f. Increase in number that may require long term health monitoring
- 3.3 The appellant has provided limited justification within their Statement of Case, in paragraphs 2.23, 2.24 and 2.25.
- 3.4 In 2.23, it is stated that the capacity of this is up to 18, however this does not include staff numbers. I've already given evidence within this document as to why small sites still have a cumulative impact on the OSEP, and therefore this is not sufficient evidence from the appellant.
- 3.5 In 2.24, the appellant states that users would look to self-evacuate, which they have argued places no pressure on blue light services. This is incorrect, and those within the DEPZ during a radiological incident with an off-site impact will be alerted to shelter. Self-evacuation is discouraged, as congestion caused by the could lead to difficulties in emergency services and workers entering and moving within the DEPZ – to respond to this, or a concurrent incident. Additionally, site users risk increased radiological exposure whilst self-evacuating. This will itself place further burden on services if they require attendance for radiation monitoring, decontamination and future long term health monitoring. I have referred to above concerns above made by the ONR about self-evacuation, and contamination monitoring. Vehicles (which would likely be multiple) leaving the site may also be contaminated and therefore there is the risk of resuspension and risk of wider contamination. As such, the population arising from this development would in turn place pressure onto the emergency services wherever they go.
- 3.6 Also in 2.24, the appellant has stated that Club House would provide temporary shelter, but has given no assurances that this is achievable, or that a robust site specific emergency plan is in place for the site. The structure is also not of a traditional build as it is made out of wood, and therefore would have to be treated as a priority site because it would not afford suitable protection for the occupants to

shelter in for up to 48hrs. As such, the population sheltering in the club house would have an impact on responders which is unacceptable and unjustified.

4 Summary

- 4.1 Therefore, this small site would still pose significant pressure on the already stretched OSEP.
- 4.2 Insufficient and inaccurate information has been provided by the appellant. Therefore, I am supportive of the Enforcement Notice as issued by the Council, as this development is within direct conflict with the Council's TB04 policy and Paragraph 102 of the NPPF.