



Appeal Decision

Site visit made on 10 February 2026

by **A Walker MPlan MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 10 March 2026

Appeal Ref: APP/X0360/C/25/3374730

Land at Gravelley Bridge Farm, Grazeley Green Road, Grazeley, Reading RG7 1LG

- The appeal is made under section 174 of the Town and Country Planning Act 1990 (as amended).
- The appeal is made by Mr Tim Evans on behalf of Gravelley Bridge Shooting Association against an enforcement notice issued by Wokingham Borough Council.
- The notice was issued on 12 September 2025.
- The breach of planning control as alleged in the notice is 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).
- The requirements of the notice are to:
 - (i) Cease the use of the Land for use as a shooting club facility/ range.
 - (ii) Remove from the Land all buildings and structures, including disconnecting all utilities, shown in blue in the approximate locations on the attached Plan 2.
 - (iii) Remove from the land all chattels, fences, hardstanding and bunds, shown in blue in the approximate locations on the attached Plan 2.
 - (iv) Remove from the Land all other paraphernalia associated with the unauthorised shooting club facility.
 - (v) Remove all the resultant materials associated with steps (i) to (iii).
 - (vi) Restore the Land to its former condition prior to the breach of planning control taking place.
- The period for compliance with the requirements is nine months.
- The appeal is proceeding on the grounds set out in section 174(2)(a) and (f) of the Town and Country Planning Act 1990 (as amended). Since an appeal has been brought on ground (a), an application for planning permission is deemed to have been made under section 177(5) of the Act.

Summary of Decision: The appeal is dismissed, the enforcement notice is upheld and planning permission is refused on the application deemed to have been made under section 177(5) of the 1990 Act as amended.

The ground (a) appeal and the deemed planning application

Preliminary Matter

1. The Council confirm that the Local Plan Update (LPU) is at Regulation 22 stage as it has been submitted to the Planning Inspectorate for examination. Whilst as a whole, the LPU is to be given limited weight, due to it still undergoing examination and there being unresolved objections to a number of policies, the Council identify several emerging policies that have less objections and therefore should be attributed moderate weight. However, there is no evidence before me to indicate what these outstanding objections are. Accordingly, as with the remainder of the LPU, I attribute these policies limited weight.

Main Issue

2. The main issues are as follows:

- Whether the development is located in a suitable location, having regard to the development plan, including the effect on the character and appearance of the area and accessibility to alternative forms of transport to the private car;
- The effect of the development on the adjacent Public Right of Way (PRoW);
- The effect of the development on flooding;
- The effect of the development on the emergency off-site plan for the Atomic Weapons Establishment site at Burghfield;
- The effect of the development on the living conditions of the occupants of nearby residential properties, with regard to noise; and
- The effect of the development on public health, with regard to land contamination.

Location

3. Policy CC02 of the Wokingham Borough Managing Development Delivery Local Plan 2014 (the LP) sets out that planning permission for proposals at the edge of defined settlements will only be granted where they can demonstrate that the development, including boundary treatments, is within development limits and respects the transition between the built up area and the open countryside by taking account of the character of the adjacent countryside and landscape.
4. The appeal site is not located within, nor near to, the development limits of a defined settlement. Policy CP11 of the Wokingham Borough Core Strategy 2010 (the CS) permits development outside development limits subject to specific exceptions.
5. Exception 1) of Policy CP11 requires development to contribute to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside.
6. Shooting *per se* is clearly a countryside recreational activity requiring open spaces, such as for clay shooting or wildlife. However, a shooting club facility is different. The appeal development comprises a building that consists of a reception/seating/gallery area that leads to the shooting range at the rear. The shooting range has a fence along the western boundary and large earth bunds along the northern and eastern boundaries. The site also contains numerous storage containers; a toilet block; large hardstanding area; and various paraphernalia associated with the use.
7. Typical of shooting ranges, there are targets set within the confines of a range which are physically contained, as they are in this instance by a fence and earth bunds. Moreover, shooters are stationary and in this instance under cover. I note that there are no facilities within the appeal site, as identified on the plan attached to the notice, for clay pigeon shooting.
8. Whilst there are no doubt shooting ranges in countryside locations, that is not to say they must be based there. They could be located within an urban environment without any loss of experience to the users. Therefore, I do not find that the

shooting range is a countryside based enterprise or activity. Accordingly, I find the development fails to satisfy exception 1).

9. Exception 1) is one step to achieving compliance with Policy CP11; exceptions 2) and 3) must also be satisfied. However, as exception 1) is not satisfied, I need not go onto consider exceptions 2) and 3). There is no dispute the development does not satisfy any of the other exceptions set out in Policy CP11.
10. Notwithstanding the failure to satisfy any of the exceptions identified in Policy CP11, it is important to consider whether the development satisfies the general objective of Policy CP11, which is to protect the separate identity of settlements and maintain the quality of the environment. The appeal site is not near any settlements and therefore does not affect the identity of any settlement.
11. In terms of maintaining the quality of the environment, the appeal site is in a countryside location characterised by open, agricultural fields interspersed with sporadic pockets of development comprising various residential and commercial uses.
12. Immediately to the south of the appeal site is a small industrial estate comprising a number of commercial units. These buildings are arranged in an intimate complex adjacent to Grazeley Green Road. It is through this site that access to the appeal site is gained. The appeal site is located some distance past these buildings and beyond the extent of land associated with the uses carried out within the estate.
13. Overall, the development represents an unacceptable encroachment into the countryside and has an incongruous urbanising effect that erodes the rural character and appearance of the area.
14. In terms accessibility of the site to alternative forms of transport to the private car, due to its secluded location and distance from Grazeley Green Road, the nearest bus stop is approximately 1.7 km from the site and is therefore not within reasonable distance. There is a PRow that runs adjacent to the eastern boundary of the appeal site.
15. The access road leading to the appeal site off Grazeley Green Road is composed of crush-and-run/rubble and is in a very poor condition. At the time of my site visit, the track was proliferated with very large potholes, particularly near the beginning of the track where large lorries frequently use it. The stretch of track towards the appeal site is in a better condition.
16. Grazeley Green Road has narrow verges with no footways and is unlit. Therefore, users of the shooting range would unlikely visit the site by walking along Grazeley Green Road. The PRow runs adjacent to the eastern boundary of the appeal site. However, this too is unlit and does not connect to any public transport services within reasonable walking distance. Therefore, users of the site would unlikely walk along the PRow to access the site.
17. I have had regard to a travel plan and the proposition of car sharing. However, there is no evidence before me of how this would work, particularly with regard to visitors. Accordingly, I am not satisfied that a condition requiring as such would be appropriate.
18. Consequently, the shooting range has very poor access to alternative forms of transport to the private car. Therefore, users of the site would be heavily

dependent on the use of the private car. This further emphasises the unsuitability of the location for the development.

19. I therefore find the development is not located in a suitable location, including the harm it has on the character and appearance of the area and its lack of access to alternative forms of transport to the private car, and therefore undermines the spatial strategy of the development plan as set out in Policies CP1, CP3, CP6, CP9 and CP11 of the CS and Policies CC01 and CC02 of the LP, which, amongst other things, seek to ensure development is in existing settlements or allocated development sites; protects the quality of the environment; and, is located where there are or will be at the time of development choices in the mode of transport available.

PRoW

20. The PRoW is a footpath for walkers only. The only access to the site is along the track that runs parallel to the site. Therefore, walkers utilising the PRoW and users of the shooting range driving to the site are both using the PRoW. As the track is unlit it may be difficult for drivers to clearly see walkers using the PRoW, particularly when it's dark. This risk would be exacerbated by the poor condition of the track as drivers would likely be focusing on avoiding potholes rather than looking for walkers.
21. As well as the physical aspect of the PRoW, the development also effects the experience of walkers that use it. Having to share the PRoW with vehicles means walkers must be vigilant for oncoming vehicles, which would not have previously been present, at least not to the current extent. This would diminish the experience of walking along this stretch of the PRoW.
22. The appellant contends that they have made improvements to the PRoW by clearing vegetation. However, there is no evidence before me that the vegetation was restricting the use of the PRoW.
23. The use is limited to certain times of the day and only open a few days a week. This reduces the harm I find above to the safety and experience of the users of the PRoW. Nevertheless, I find the development has an unacceptable harmful effect on the PRoW, contrary to Policy CP3 of the CS, which seeks to ensure development provides a safe scheme. It would also be contrary to paragraph 105 of the National Planning Policy Framework (the Framework), which states that planning decisions should protect and enhance public rights of way and access.

Flooding

24. The appeal site is located within Flood Zones 2 and 3a. The Framework requires applications for development to be supported by site specific flood risk assessments, as well as a sequential test and exception test if applicable. The Planning Practice Guidance (PPG) states that the Sequential Test should be applied to non-major development proposed in areas at risk of flooding. Given the appeal site falls within Flood Zones 2 and 3, this is an area at risk of flooding and therefore a Sequential Test is required.
25. Footnote 62 of the Framework confirms that changes of use do not require a Sequential Test to be carried out, except for changes of use to a caravan, camping or chalet site, or to a mobile home or park. Whilst the appeal development

includes a change of use, it also includes operational development and engineering works and therefore a Sequential Test is required. No Sequential Test has been carried out. Furthermore, there is no evidence of a flood risk assessment before me.

26. Consequently, the appellant has not undertaken a sequential approach and locate the most vulnerable development in the areas at lowest risk of flooding; there is no consideration of how a range of flooding events (including extreme events) will affect people and property; it has not been demonstrated that the development will not increase flood risk elsewhere; and, there is no consideration of how people will be kept safe from any flood hazards.
27. I acknowledge that the development is classed as less vulnerable development and that the Exception Test does not need to be applied. However, that does not negate the need for a Sequential Test and flood risk assessment.
28. I have had regard to the imposition of a condition, in the event I allow the appeal, requiring an assessment of climate change, raised finished floor levels, appropriate flood storage compensation and resistant/resilient measures. However, I cannot be certain that such measures could sufficiently mitigate any risk to flooding.
29. With regard to surface water drainage, the appeal site comprises a large area of hardstanding and a number of solid roof buildings and structures. As such, there is likely to be a greater degree of surface water run-off. There is no evidence before me confirming how this is mitigated, which further adds to the concerns regarding flooding.
30. I am not satisfied that the development avoids unacceptable flood risk. As such, it is contrary to Policy CP1 of the CS, Policies CC09 and CC10 of the LP and the Framework which seek to avoid increasing risks of or from all forms of flooding.

Emergency plan

31. The site lies within the Detailed Emergency Planning Zone (DEPZ) for the Atomic Weapons Establishment at Burghfield. Policy TB04 of the LP states that development will only be permitted where the applicant demonstrates that the increase in the number of people working 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 (EOSP) for the Atomic Weapons Establishment site at Burghfield. It goes on to require the appellant to provide this information where the proposal includes more than one person working and/or visiting the development if it lies within the Inner Consultation Zone, which the appeal development does.
32. The appellant contends that the development is only small in scale, accommodating a maximum of 18 shooters in addition to the small number of staff. All staff and visitors arrive by their own means of transport and therefore, in the event of an emergency, they could self-evacuate. If they cannot self-evacuate they could use the club house as a temporary shelter. As such, the appellant considers there would be no undue pressure on blue light services.
33. However, self-evacuation is discouraged as it can lead to congestion that can hinder the effective operation of blue light services. Even within the site itself and

the track leading to Grazeley Green Road, up to 18 cars plus those of staff trying to exit the site simultaneously along a poorly conditioned track would likely take a substantial amount of time for everyone to evacuate safely, before they even get to the main highway network.

34. Despite the number of site users being relatively small, small developments have a cumulative effect. Each one increases demand on the resources available to implement the EOSP in the event of a radiation emergency. This demand would be in addition to the needs of existing people requiring assistance in the locality in the event of an evacuation. This can have a detrimental effect on the effectiveness of the EOSP.
35. The club house is a timber building and therefore would be treated as a priority site as it would not provide suitable protection for occupants to shelter in for up to 48hrs. As such, it would have an impact on blue light services resources, for which there is no justification.
36. I therefore find, the development would have an unacceptable harmful effect on the emergency off-site plan for the Atomic Weapons Establishment site at Burghfield. As such, it is contrary to Policy TB04 of the LP and Policy CP3 of the CS, which seeks to ensure that development provides a safe scheme. It would also fail to accord with paragraph 102 of the Framework, which promotes public safety.

Living conditions

37. On the evidence before me, the only shooting activity that takes place on the appeal site is the use of air rifles on the shooting range. Whilst clay pigeon shooting equipment is stored within the confines of the appeal site, the clay pigeon shooting itself takes place elsewhere. From the observations I made during my site visit, this appears to take place in a field adjacent to the appeal site. However, as the field falls outside the appeal site and no shotguns are fired within the appeal site, my consideration of the effects of noise on nearby residents is limited to the use of air rifles only within the appeal site.
38. There are no immediate residential properties that neighbour the appeal site. The nearest properties, along Mere oak Lane, Grazeley Green Road and Kybes Lane are separated from the appeal site by expansive fields.
39. The Council's Environmental Health department contends that a noise impact assessment is required. However, they make this comment in the context of clay pigeon shooting. They make no comment on the use of air rifles.
40. Although I note the comments received from a nearby resident outlining the effects the noise from shooting has on their health and wellbeing, it is not clear whether the noise they refer to is from air rifle or clay pigeon shooting. Given the proximity of the field that clay pigeon shooting appears to take place to the residential property concerned, I suspect clay pigeon shooting is the primary concern.
41. It is reasonable to conclude that firing an air rifle creates significantly less sound than firing a shotgun. The earth bunds and fencing that bound the shooting range would likely absorb some of the sound generated from the air rifles. Even though the range can accommodate up to 18 users at once, in the unlikely event that 18 air rifles are fired simultaneously I find it unlikely that it would generate a level of

noise that could be discernibly heard at the nearest residential properties, let alone to such an extent that it would be detrimental to the living conditions of the occupants of these properties.

42. I therefore find the development does not have an unacceptable effect on the living conditions of the occupants of nearby residential properties, with regard to noise. As such, it complies with Policy CC06 of the LP and the Framework, which seek to ensure development does not harm neighbouring residents.

Land Contamination

43. The Council raise concern about the implications lead and other metals may have in respect of land contamination. However, it is not clear whether this concern relates solely to clay pigeon shooting and the use of lead shot, or pellets fired from air rifles, or both.
44. Air rifles typically use pellets. The shooting range is enclosed and therefore the vast majority of the pellets fired would likely be contained within the range. I find therefore, in the event I allow the appeal, an appropriately worded condition could be imposed requiring a management plan to mitigate any potential risk of pellets contaminating the land.
45. As such, I find the development does not have an unacceptable effect on public safety with regard to land contamination. As such, it would comply with Policy CP1 of the CS, which seeks to minimise the emission of pollutants into the wider environment.

Other Matters

46. I have had regard to the imposition of a condition restricting the use to operate, and the operational development and engineering works to remain, for a temporary period of time, in effect a temporary permission. Notwithstanding there being no temporary period suggested, there is no evidence before me to justify imposing such a condition that would allow the unacceptable harms I have identified above to continue, albeit temporarily.

Conclusion on the ground (a) appeal and the deemed planning application

47. For the reasons given above, having considered the development plan as a whole and all material considerations, I conclude that planning permission should not be granted in response to the ground (a) appeal against the enforcement notice and deemed planning application.

The ground (f) appeal

48. This ground of appeal is that the steps required by the notice to be taken, or the activities required by the notice to cease, exceed what is necessary to remedy any breach of planning control which may be constituted by those matters or, as the case may be, to remedy any injury to amenity which has been caused by any such breach.
49. The appellant contends that the fences could be erected under permitted development rights. However, the fence was clearly erected as part of the overall development of the shooting range, which would undoubtedly have been constructed as a single operation. As part of the shooting range required planning

permission, all of it required planning permission. Therefore, the fence was not permitted development.

50. Moreover, the fence is not of a design that is typically found in a rural location such as this. Even if the fence alone was retained, it would appear as an incongruous urban feature that would detract from the rural character and appearance of the area.
51. Accordingly, as the fence forms part of the overall breach of planning control, it is not excessive to require its removal in order to remedy the breach of planning control. In addition, it would not exceed what is necessary to remedy the injury to amenity caused by the breach.
52. The ground (f) appeal therefore fails.

Formal Decision

53. The appeal is dismissed, the enforcement notice is upheld and planning permission is refused on the application deemed to have been made under section 177(5) of the 1990 Act as amended.

A Walker

INSPECTOR