



Appeal Decision

Site visit made on 10 September 2025

by Lewis Condé BSc, MSc, MRTPI

an Inspector appointed by the Secretary of State

Decision date: 24 October 2025

Appeal Ref: APP/W0340/W/25/3368488

**Holybrook Farm, Road Known as Burghfield Road, Burghfield, Reading,
West Berkshire RG30 3RA**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Andrew and Michelle Bucknell against the decision of West Berkshire District Council.
 - The application Ref is 23/01518/FUL.
 - The development proposed is demolition of existing dairy barn and erection of new flexible barn for light industrial (E) and B8 use.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The Procedural Guide: Planning Appeals (England) establishes that the appeal process should not be used to evolve a scheme and there are no provisions within the rules for amendments to be submitted. It goes on to state that it is important that what is considered by the Inspector at appeal is essentially the same scheme that was considered by the local planning authority (LPA) and by interested parties at the application stage. The guidance indicates that where amendments are proposed during the appeal process, the Planning Inspectorate will consider whether to exceptionally accept them.
3. This is further reflected by the Planning Practice Guidance (PPG), which sets out that in general, appeals are determined on the same basis as the original application. The PPG also advises that before making any appeal the party seeking permission should first consider re-engaging with the local planning authority to discuss whether any changes to the proposal would make it more acceptable and likely to gain permission.
4. Both at the outset of the appeal and following the Council submitting its statement of case, the appellants have sought to evolve the proposed scheme. This has included changes to the design of the proposed building, as well as substantially updated/new flood risk evidence.
5. Although the appellants may already have spent a considerable period of time trying to advance the proposal with the Council, no exceptional circumstances have been identified as to why the revised scheme(s) and new evidence should be accepted. Accordingly, I have determined the appeal in line with the original scheme that the Council made its decision upon and its related application drawings/evidence.

6. Since the determination of the original application the Council has adopted the West Berkshire Local Plan Review 2023 – 2041 (the LPR). The LPR forms part of the Council's statutory development plan and supersedes the West Berkshire Core Strategy 2006-2026. In line with legislative requirements and the advice of the PPG, I have therefore taken account of the updated policy position in my determination of this appeal. Main parties have also had sufficient opportunity to address the change in policy context.
7. Due to the above change in policy context the Council has withdrawn its fourth reason for refusal, in relation to parking standards. From the evidence before me, I have no reason to contest this matter.

Main Issues

8. In light of the above, the main issues are:
 - Whether the appeal site is a suitable location for the proposal having regard to flood risk;
 - Whether the appeal site is a suitable location for the proposal having regard to its accessibility by sustainable means of travel; and
 - The effect of the proposal on highway safety.

Reasons

Flood Risk

9. The appeal site lies within Flood Zone 3 (High Risk of Flooding). The National Planning Policy Framework (the Framework) seeks to prevent inappropriate development in areas at risk of flooding by directing development away from areas at highest risk. Where this is not possible, both the Framework and the PPG set out, amongst other matters, that development proposals should be made safe for their lifetime without increasing flood risk elsewhere. This approach to management of flood risk is also further promoted under LPR Policy SP6 (Flood Risk).
10. The proposed development would involve a replacement building with an identical footprint as that currently on site. Main parties are therefore satisfied that compliance with the sequential test for flooding is not necessary in this particular case. No robust reasons have been presented to me to conclude otherwise.
11. Nevertheless, to comply with both national and local flood risk policy outlined above, the proposed development should still demonstrate amongst other matters, that it would not increase flood risk elsewhere, and where possible reduce flood risk overall.
12. Despite the matching footprint, the proposed building would be a more highly enclosed structure than that it would replace. Even accounting for the existing building's materiality and the loss of the milking parlour area, I consider that the proposal would be more likely to potentially affect and interrupt flood flows, whilst decreasing the available volume of floodplain storage at the site.
13. Although such loss of floodplain storage may be limited, the Environment Agency objected to the application proposal, advising that to avoid an increase in flood

risk, either flood plain compensation would be required, or the proposed development would need to be a fully floodable structure.

14. The appeal building incorporates the use of a raised floor with voids beneath, to allow potential flood water to penetrate and pass through the structure. However, the PPG is clear in its advice that whilst the use of stilts and voids below buildings may be an appropriate approach to mitigating flood risk to the buildings themselves, such techniques should not normally be relied upon for compensating for any loss of floodplain storage. This is because voids do not allow water to freely flow through them, trash screens get blocked, voids get silted up, they have limited capacity, and it is difficult to stop them being used for storing belongings or other materials.
15. The appeal building has therefore not been suitably designed such that it would be fully floodable and thereby maintain the existing volume of floodplain storage at the site. Additionally, in the absence of any compensatory floodplain, I consider that the appeal development would lead to increased flood risk through the loss of floodplain storage.
16. The incorporation of flood resilience measures into the design of the building, such as positioning electrics at high-levels and the use of appropriate materials, together with the use of flood warning/evacuation protocols, may result in the appeal building being safe for the lifetime of the development. However, this does not overcome the fact that the appeal scheme would result in the loss of floodplain storage leading to a potential increase in flood risk elsewhere. Nor does a lack of objection from the Lead Local Flood Authority overcome this matter.
17. The proposal therefore conflicts with LPR Policies SP5 (Responding to Climate Change) and SP6, together these policies seek to ensure that flood risk from all sources can be avoided or appropriately managed.

Sustainable Travel

18. The appeal site is located approximately 3km to the south-west of Reading and approximately 500m to the north of Burghfield. Although the appeal site is not isolated, in planning policy terms as defined under LPR Policy SP1 (Spatial Strategy), it is in the open countryside.
19. Together LPR Policies SP1, SP5, SP19 (Transport) and DM42 (Transport Infrastructure) seek to promote sustainable development through promoting growth in sustainable locations, whereby development would be accessible by sustainable means of transport.
20. Holybrook Farm already contains established employment uses. The proposal however would intensify the use of the site likely resulting in far greater levels of vehicular movements, including notably more employees accessing the appeal site. Additionally, whilst light industrial and storage and distribution uses inherently involve vehicular movements, this does not mean that they are incapable of being sited in locations that are accessible via sustainable means of transport, including for employees.
21. The nearest public transport options to the site are two bus stops, located either side of Burghfield Road, within walking distance of the appeal site. However, despite their proximity there is no pedestrian footway between the site and the bus

stops, while this section of Burghfield Road is rural in character, with limited grass verges to the side of the road and a lack of streetlighting. Meanwhile, the road appeared highly trafficked and is subject to a 40mph speed limit.

22. On my site visit, I walked from the appeal site to the bus stops and back. This was an unpleasant experience that did not feel safe, due to the level, proximity, and speed of traffic, including the presence of several heavy goods vehicles. Due to the lack of pedestrian footways, it also entailed having to frequently take cover within vegetation aligning the road as precaution from close passing vehicles. I therefore consider it highly unlikely that future users of the appeal scheme would choose to walk from the bus stops to the appeal site, particularly during periods of darkness or inclement weather.
23. Since the determination of the original application the appellants have installed a gated access to a field adjacent to the nearby bus stops. This gated access and adjoining land is outside the redline boundary for the appeal site but is said to be under the appellants' ownership/control.
24. It is put to me that a footway could be created through the land adjoining the appeal site to the bus stop, thereby creating a safe walking route and improving the appeal scheme's accessibility by sustainable modes of transport. Notwithstanding that such works would fall outside of the appeal site boundary, only very limited details of the footway have been provided. I cannot therefore be sure that such a route would be acceptable and deliverable. For example, a lengthy pathway through rural fields that would provide use all year round is likely to have wider planning implications, notably, in terms of the character and appearance of this rural area, or in respect of biodiversity. In this instance, it is therefore not suitable to secure such provision via the use of a planning condition.
25. I find that the position of the site and the character of the surrounding highway network is also such that it would be highly unlikely to encourage walking or cycling to the appeal site. Access to the proposal would therefore be highly dependent on the use of private motor vehicles, the least sustainable form of transport.
26. The Framework recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. However, I find the site's context would not provide realistic opportunity for future users to utilise sustainable means of transport.
27. Bringing the above together, I find the appeal site is not a suitable location for the appeal proposal having regard to its accessibility by sustainable means of travel. It therefore conflicts with the aims of LPR Policies SP1, SP5, SP19 and DM42.

Highway Safety

28. The appeal site is accessed off a busy public highway, via a bell-mouth junction, which narrows to a single-track road as it enters the main element of the appeal site.
29. The level of vehicular movement associated with the appeal proposal provides increased potential for conflicts between vehicles, as well as pedestrians, along the single-track access into the site. Since the determination of the planning application the appellants have though constructed a new access arrangement.

This has primarily involved the provision of a vehicle passing area on land outside of the redline boundary for the appeal site, but from the available evidence¹ is within the appellant's ownership/control. Additionally, a section of separate pedestrian footway has been created alongside the private vehicular access road.

30. I do not have any detailed information as to whether the above works are lawful, nor do they comprise part of the current appeal proposal. Nevertheless, the Council and Local Highway Authority (LHA) have been made aware of the works and there is no indication that the access arrangements that have been provided are deemed untoward or that any action is to be taken against the works.
31. Indeed, whilst the LHA has expressed that it would have been preferable for further discussions and detailed plans to have been agreed prior to implementation, it has highlighted that the works undertaken are a welcomed improvement. Moreover, the works that have been completed are indicated by the LHA as having addressed its previous highway safety concerns.
32. From my observations and the evidence before me, the off-site works that have been completed provide sufficient space for two vehicles to pass one another. This includes vans passing alongside the largest refuse vehicles that may utilise the appeal site. Accordingly, conflicts between vehicles along the access road could be appropriately managed, without requiring vehicles to overhang or reverse back onto the main public highway. Additionally, the separate footway that has been installed provides suitable segregation of pedestrians and vehicles along this section of the site's internal access road.
33. Based on the above works that have already taken place, I am satisfied that the appeal proposal would not cause harm to highway safety. In respect of this main issue, the appeal scheme therefore complies with LPR Policy SP19, insofar as it seeks to ensure development proposals do not adversely affect the safety of the local highway network.

Other Matters

34. I do not have full background details of the planning history for the wider buildings/uses at Holybrook Farm. However, from the information before me, it appears likely that previously established storage and distribution uses were progressed following the grant of prior approval for the conversion of agricultural building(s) to such use, or in connection with the issuing of a certificate of lawfulness for such use. Therefore, matters including the suitability of the site for employment uses and/or flood risk may not have been relevant planning considerations, nor can suitable comparisons between previously approved uses at the site and the current proposal be drawn.
35. The appellants have referred to the Council supporting similar proposals in comparable locations, but again have provided very limited details to support these claims. Specific reference has been made to a recent permission for an energy recovery facility (Ref:24/00247/MINMAJ), but it remains that a lack of contextual details, including that site's background planning history and policy context, prevents appropriate comparisons with the appeal scheme.

¹ Including a Land Registry Title Plan.

36. Despite the appeal scheme complying with other development plan policies, for example in respect of the character and appearance of the area, neighbouring living conditions and highway safety, it remains that the appeal scheme conflicts with the development plan as a whole.
37. Even if the existing agricultural use of the site is no longer viable, this does not obviate the need for the appeal proposal to accord with development plan policies in respect of flood risk or the location of new employment development. Nor does the provision of the Framework in respect of supporting a prosperous rural economy. Meanwhile, it has not been shown that the appeal proposal is the most efficient and logical way to address concerns with the asbestos roof of the existing building.
38. LPR Policy SP17 sets out the Council's strategic approach to employment land. The policy offers support to proposals for industrial, or storage and distribution uses, in certain locations. However, it has not been suitably demonstrated that the proposal would benefit from such support, due to its level of accessibility, or lack of compliance with other development plan policies.
39. There is an identified need for light industrial, and storage and distribution uses in the authority area, with the appeal scheme having received support from the Council's Economic Development Officer. Furthermore, the proposal would provide socio-economic benefits, including employment opportunities, associated with both its initial delivery and future use. Based on the scale of the appeal scheme and the information before me, the likely level of such benefits would be moderate. The proposal would also utilise brownfield land, thereby providing some environmental benefits.
40. Together the other matters raised in relation to the proposal do not overcome my above concerns in respect of the increase in flood risk or the site's accessibility.

Conclusion

41. For the reasons outlined above, the appeal scheme conflicts with the development plan, and there are no material considerations that justify a decision other than in accordance with it. The appeal is therefore dismissed.

Lewis Condé

INSPECTOR