

PLANNING REF : 252782  
PROPERTY ADDRESS : 43 East Park Farm Drive  
: Charvil, Reading  
: RG10 9UG  
SUBMITTED BY : Mr Ivan Milenkovic  
DATE SUBMITTED : 12/12/2025

COMMENTS:

Objection Statement: Strong Objection to Inappropriate Industrial Development

I object to the above planning application in the strongest possible terms. The proposal to convert a former local service station into a dedicated industrial fuel depot is fundamentally unsuited to this location. It represents an unacceptable risk to public safety, environmental integrity, and highway efficiency, in direct contravention of Wokingham Borough Council's Core Strategy and the National Planning Policy Framework (NPPF).

1. Critical Fire Safety Risk: The "Domino Effect" The most alarming aspect of this application is the complete failure to address the cumulative risk posed by the site's immediate surroundings. The proposed fuel depot (storing highly flammable hydrocarbons) is located directly adjacent to E-Quipfix Ltd (Unit 2, Denmark House), a business servicing the tyre industry.

Incompatibility: Tyres constitute a high-intensity fire load that is notoriously difficult to extinguish. The co-location of bulk fuel storage next to a tyre-industry site creates a textbook "Domino Effect" scenario. A fire initiating at the tyre facility would generate intense thermal radiation capable of compromising the integrity of fuel tanks, leading to a catastrophic pool fire.

Lack of Assessment: The application lacks a cumulative hazard assessment or "Domino Effect" analysis. By treating the fuel depot in isolation, the applicant has failed to account for the real-world risk of an escalating major incident.

Emergency Access: In the event of such a fire, the smoke plume and thermal hazard would necessitate the immediate closure of the A3032. This would sever a critical transport link and impede the arrival of emergency services from Twyford or Reading, placing residents and the nearby "Waggon & Horses" public house in immediate danger.

2. Unacceptable Environmental and Flood Risk The site is located within Flood Zone 3 (High Probability of Flooding), within the functional floodplain of the River Loddon.

Policy Violation ( Sequential Test): Locating "Highly Vulnerable" or "More Vulnerable" infrastructure (hazardous storage) in Flood Zone 3 is a direct violation of the NPPF and MDD Policy CC09. The applicant has failed to demonstrate that no lower-risk sites (Flood Zone 1) are available elsewhere in the borough.

Pollution Threat to SSSI: The site borders the Loddon Nature Reserve, a Site of Special Scientific Interest (SSSI). This habitat is critical for the nationally rare Loddon Pondweed (*Potamogeton nodosus*) and Loddon Lily. Hydrocarbons are phytotoxic; a leak caused by floodwater displacing tanks

(hydrostatic uplift) or bypassing interceptors would cause irreversible chemical damage to this sensitive ecosystem.

**Inadequate Drainage:** The proposal to use "lined cellular storage" in an area with a high water table (where groundwater levels are frequently <0.5m from the surface) is engineeringly flawed. In flood conditions, these systems are prone to failure, risking the direct discharge of contaminated fuel run-off into the Old River and Loddon catchment.

**3. Severe Highway Safety Concerns** The A3032 (Old Bath Road) is a residential distributor road serving schools, commuters, and cyclists; it is not a strategic freight corridor suitable for industrial haulage.

**Accident History:** The road already presents significant dangers to vulnerable users. In February 2024, a cyclist sustained serious head injuries in a collision at the nearby roundabout. In April 2021, a teenage pedestrian was hospitalised after being struck by a van wing mirror on the adjacent network. Introducing large fuel tankers with significant blind spots into this environment statistically increases the probability of fatal accidents.

**Physical Unsuitability:** The site access is geographically constrained. Articulated tankers (16.5m) entering or exiting the site will inevitably require the full width of the road, crossing into the opposing carriageway ("scissor movement"). This creates a lethal hazard for oncoming traffic and cyclists, who may be crushed if they attempt to undertake a turning vehicle.

**Traffic Volume:** While the application downplays vehicle numbers, a fuel depot operates on throughput. To make the site commercially viable, the turnover of fuel must be high, resulting in an intensification of HGV movements that far exceeds the historical use of the site as a car repair garage.

#### 4. Failure of Due Process and Planning Policy

**Retrospective Activity:** It is noted that works to transition the site for fuel use commenced prior to permission, requiring previous enforcement intervention by the Council. This disregard for planning process suggests a lack of diligent stewardship necessary for managing hazardous substances.

**Policy CP1 & CP3:** The development fails to "maintain or enhance the quality of the environment" (CP1) and is inappropriate to the "scale, character and function of the settlement" (CP3). Charvil is a village, not an industrial park.

**Conclusion** This application attempts to squeeze a high-risk industrial facility into a residential floodplain next to a protected nature reserve. The cumulative fire risk with the adjacent tyre facility has been ignored, the flood risk is unmitigable, and the traffic impact on the A3032 is dangerous.

I urge the Planning Officer and Committee to REFUSE this application

to protect the safety of Charvil residents and the integrity of the Loddon environment.