

FAO the Case Officer

By email only

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To whom it may concern,

250959 | Full application for demolition of two existing buildings and a garage and the change of use from service station to a fuel oil storage and distribution facility including the recladding of the existing building, installation of 8 no. fuel oil storage tanks, refurbishment of hardstanding, car parking and associated works. | Former Prince Bros Service Station Old Bath Road Reading

In relation to the above application, we have the following comments on behalf of the Berks, Bucks and Oxon Wildlife Trust (BBOWT). As a wildlife conservation-focused organisation, our comments relate specifically to the protection and enhancement of the natural environment and wildlife. We comment on as many relevant issues as our resources allow, and the absence of a comment on an issue should not be taken as our approval.

BBOWT objects to the applicant's proposal because of the likely negative impacts from pollution and run off and possible oil spills on the species in and the habitat quality of the adjacent Local Wildlife Sites, the River Loddon and BBOWT's Loddon Nature Reserve.

The Twyford Gravel Pits (Loddon Reserve & Charvil Country Park) Local Wildlife Site (LWS) is directly adjacent to the site. The wet woodland in the LWS is considered of moderate ecological value and of county level importance and the lake just 0.03km from the southern boundary is also county level importance. important for overwintering and breeding birds. The wet woodland continues across the shared boundary between the LWS and the site boundary of the proposed development. We consider it to be highly likely that this wetland habitat and the LWS as a whole will be negatively impacted by pollution from the construction and operation of the site, not just from possible oil spills



but from the many HGVs and other large vehicles that will be using the site. In fact, the proposed site layout shows that tankers and other large vehicles very close to the site boundary, adjacent to the wet woodland, meaning there is very little buffer to mitigate this possible pollution.

In addition, as the site will be a sealed impermeable surface, during heavier rainfall chemicals, oil, sediment and other pollutants won't just wash off from the site and into the wet woodland but also possible into the other surrounding freshwater habitats; the LWS lakes, BBOWT's Loddon Nature Reserve and the River Loddon. The many large vehicles frequently using the site will likely result in run off into the LWS site leading to habitat degradation and putting species at risk. Pollutants and hazardous substances found in run off are often persistent and have bio-accumulative properties, so they do not just negatively impact the aquatic plants and invertebrates but also amphibians, fish, birds and mammals further up the food chain.

Charvil Country Park West and Charvil Meadows LWS consists of a series of traditionally managed meadows bordering the River Loddon, interspersed with hedgerows and a wide scrub and tree-lined ditch. The County Park consists of a variety of grassland habitats with some species of lowland meadow present, acidic and calcareous areas, fen habitats, floodplain grazing marsh, broadleaved seminatural woodland, wet woodland, willow carr on two old gravel pit sites and a third gravel pit in the south. These habitats are used by overwintering wildfowl and other species which could be at risk from pollution.

The River Loddon itself is 0.013km from the proposed site, is also a Local Wildlife Site and a chalk stream. Chalk streams are a rare habitat with only around 200 globally and 85% are in the south of England. These rivers are also especially fragile and vulnerable to pollution as their waters are supposed to stay cool, however, pollution such as hydrocarbons from vehicles and roads can increase the temperature of the water distributing the whole habitat as well as chemicals in the runoff impacting the health of species directly. Despite the Loddon's importance, both ecologically and to local people who enjoy the river, currently all the waterbodies in the Loddon catchment are considered to be in 'Moderate', 'Poor' or 'Bad' ecological condition. Run off and urban pollution is already one of the pressures on the Loddon from existing development and roads in close proximity on the river such as the A3032. The proposed development could exacerbate the current pressure and lead to the deterioration of the river's ecological health which would also impact species downstream.

The applicant's ecological impact assessment has identified that habitat degradation, pollution and sediment run-off, which may result from construction and operation 'will incur a negative impact at the county level' to the wet woodland and lakes.

We do not believe the mitigation will be sufficient to prevent this harm to county designated sites (Local Wildlife Sites in Berkshire), BBOWT's Loddon Nature Reserve the nearby water courses including the River Loddon and will reduce ability of the adjacent and nearby site to support fauna and flora. Therefore, the proposal does not comply with local policy CP3 - General Principles for development and CP7 - Biodiversity Wokingham Borough Core Strategy (Adopted 29 January 2010) (see relevant policy below).

Relevant Policies

CP3 - General Principles for development

Planning permission will be granted for proposals that:

*c) Have **no detrimental impact upon important ecological**, heritage, landscape (including river valleys) or geological **features or water courses**.*

*d) **Maintain or enhance the ability of the site to support fauna and flora** including protected species;*

CP7 - Biodiversity

Sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance.

Development:

*A) Which may **harm county designated sites (Local Wildlife Sites in Berkshire)**, whether directly or indirectly, or*

*B) Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or **features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors)**, whether directly or indirectly, or*

C) That compromises the implementation of the national, regional, county and local biodiversity action plans

will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and:

i) Mitigation measures can be put in place to prevent damaging impacts; or

ii) Appropriate compensation measures to offset the scale and kind of losses are provided.

Please do not hesitate to get in touch should you wish to discuss any of the matters raised.

Yours sincerely,

Holly Gray

Planning and Policy Officer

Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust