

PLANNING REF : 252782
PROPERTY ADDRESS : 10 East Park Farm Drive
: 10 East Park Fa Charvil, Reading, Berkshire, Berkshire
: RG10 9UJ
SUBMITTED BY : Mrs Amanda Rutter
DATE SUBMITTED : 08/12/2025

COMMENTS:

I wish to submit a formal objection to planning application 252782 for the proposed fuel oil storage and distribution facility. Having reviewed the application documents and considered the implications for our community, I have significant concerns about the suitability of this development.

1. SEVERE ENVIRONMENTAL RISK TO CHARVIL COUNTRY PARK AND PROTECTED SPECIES

The site's immediate proximity to Charvil Country Park and the River Loddon presents an unacceptable environmental risk. This area supports European Protected Species, specifically otters (protected under the Conservation of Habitats and Species Regulations 2017), as well as nationally rare endemic species including the Loddon dragonfly and Loddon lily, which are found nowhere else in the country.

The park provides important habitat for diverse wildlife including nesting waterfowl, herons, bats, deer, amphibians and established fish populations. As a regular user of this nature reserve, I've witnessed the ecological value of this area and the conservation work undertaken to enhance it.

The proposal to store approximately 800,000-1,000,000 litres of diesel, kerosene and other petroleum products within metres of this sensitive ecosystem creates a catastrophic contamination risk. Any spillage or tank failure would cause irreversible damage to protected habitats and could result in criminal liability under wildlife protection legislation.

The applicant's claimed 14% biodiversity net gain through planting six trees and some shrubs is wholly inadequate mitigation for the scale of environmental risk posed by industrial fuel storage adjacent to a nature reserve. This appears to be a token gesture to satisfy planning requirements rather than genuine environmental protection.

Furthermore, this proposal directly contradicts the Twyford and Charvil Neighbourhood Plan (May 2024), which explicitly requires developments to "identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks" and to "mitigate any impact of development on biodiversity."

2. FLOOD RISK AND INEVITABLE CONTAMINATION SCENARIO

The site is located within a documented floodplain with a history of regular inundation. Evidence includes:

- Wokingham Borough Council flood reports (2014) confirming the site was completely submerged
- Recent flooding events (2024) with water surrounding the site and reaching building level
- Annual winter flooding affecting the meadows and site perimeter
- Multiple eyewitness accounts from local residents

Storing petroleum products at a site with this flood history is fundamentally unsafe. During flood events, engineered containment systems such as bunds become ineffective when the entire site is underwater. Fuel, being lighter than water, will float and disperse across floodwater, contaminating:

- The River Loddon and St Patrick's Stream
- Charvil Country Park lakes and associated wetlands
- Downstream watercourses including the River Thames
- Local aquifers and groundwater
- Riparian habitats and protected wildlife areas

Recovery and remediation following a flood-related fuel spill would be extremely difficult, if not impossible, across such a wide dispersal area. The environmental damage would be long-lasting and potentially permanent.

Climate change projections indicate increasing flood frequency and intensity for the Thames Valley region. The Environment Agency's latest guidance requires consideration of enhanced rainfall patterns and flood risk over the operational lifetime of developments.

Approving fuel storage at this location effectively guarantees a future environmental disaster as climate impacts intensify.

I note the application indicates a surface water discharge pipe running directly to the River Loddon. For a site handling petroleum products, this represents an unacceptable direct contamination pathway. The Environment Agency must formally approve this arrangement, and their consultation response should be a prerequisite for determination.

3. COMBINED FIRE RISK - INADEQUATE HAZARD ASSESSMENT

The application contains a critical omission that prevents proper safety assessment: it fails to evaluate the cumulative fire risk created by siting a fuel storage facility directly adjacent to an existing tyre storage and distribution warehouse.

Fire risk context:

Tyre storage is classified as a high-hazard operation under the Environmental Permitting (England and Wales) Regulations 2016. The Environment Agency's Fire Prevention Plan Guidance (2018) specifically identifies tyre storage as requiring strict separation and mitigation due to:

- Extreme heat release (temperatures exceeding 1000 C)
- Difficulty of extinguishment (fires can burn for weeks)
- Toxic smoke containing carcinogens and heavy metals
- Potential for explosive events

The proposed fuel depot would store substantial quantities of flammable and combustible liquids regulated under the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR), creating its own significant fire and explosion hazard.

Combined risk scenario:

A fire originating at either facility would create immediate risk of cross-boundary ignition, resulting in a compound incident involving both burning tyres and ignited fuel. The consequences would include:

- Major incident requiring extended emergency response (potentially days)

- Risk of fuel tank rupture and explosion from radiant heat exposure
- Large-scale toxic smoke plume affecting residential areas
- Necessary evacuation of nearby homes
- Severe environmental contamination from firefighting runoff
- Complete road closure eliminating evacuation routes

Regulatory non-compliance:

This omission violates the National Planning Policy Framework requirements:

- Paragraph 97: decisions must "promote public safety and take into account wider security and defence requirements by anticipating and assessing possible risks"

- Paragraph 174: requires consideration of "cumulative effects arising from new development"

Under the Town and Country Planning Act 1990 (Section 70(2)), the Local Planning Authority must consider all material planning considerations including cumulative hazards from adjacent land uses. The absence of cross-boundary fire risk assessment means the Council lacks essential information for lawful determination.

I formally request:

- Mandatory combined fire risk assessment before determination

- Formal consultation with the Health and Safety Executive
- Fire and Rescue Service assessment of emergency response capability and evacuation planning
- Demonstration of adequate separation distances or mitigation measures meeting industry standards

4. HIGHWAY SAFETY CONCERNS AND INADEQUATE INFRASTRUCTURE

Old Bath Road is a semi-rural residential road with substandard geometry, inadequate for intensive HGV operations. The proposed traffic generation represents a dangerous intensification:

Infrastructure deficiencies:

- Narrow carriageway with restricted forward visibility around a double bend
- Substandard footway width (inadequate when passing HGVs)
- Missing footway provision on sections of the route
- Existing severe congestion during peak periods

- Current problems with HGV access to adjacent tyre depot causing road blockages and safety conflicts

Vulnerable road user risk:

This route serves as the primary pedestrian and cycle link between Charvil and Twyford, with significant vulnerable user groups:

- Children accessing Charvil Piggott Primary School and The Piggott Secondary School
- Families and recreational users accessing Charvil Country Park
- Elderly residents from surrounding developments
- Commuter cyclists traveling to Twyford Station

- Four bus services sharing the carriageway

Observed dangerous manoeuvres:

During the applicant's unauthorised operation in December 2024, articulated tankers were observed executing dangerous manoeuvres including swinging across both carriageways when turning, conflicting with traffic emerging from the blind bend, and completely obstructing the footway.

The submitted Transport Assessment appears to underestimate peak hour conflicts, cumulative impacts with existing tyre depot traffic, pedestrian delay and risk, and accelerated road deterioration from HGV axle loading (the road was recently resurfaced but is not designed for this traffic loading).

This proposal directly contradicts the Twyford and Charvil Neighbourhood Plan's explicit objective to "reduce traffic flow, connect walking and cycling routes, and provide adequate pavements to improve pedestrian safety" along Old Bath Road.

Given the combination of HGV volume, infrastructure constraints, vulnerable users and poor visibility, serious or fatal accidents are a probable outcome if this development proceeds. The Highways Authority should conduct a Stage 1 Road Safety Audit and provide a

formal response on safety grounds.

5. EMERGENCY RESPONSE AND COMMUNITY RESILIENCE

The site configuration creates critical emergency response constraints:

- Single point of access shared with adjacent premises
- Old Bath Road would be blocked during any major incident, eliminating egress
- Restricted access for emergency vehicles and specialist equipment

- No viable evacuation route for residents (trapped between incident site and A4)
- Unknown capability of local Fire and Rescue Service for specialist fuel fire response

A compound fire incident involving both fuel depot and tyre warehouse would require multiple fire appliances, hazmat teams, environmental containment measures, extended road closures, and possible evacuation of several hundred homes. Such an incident would necessitate mutual aid from surrounding fire services and could last for days.

Has the Fire and Rescue Service been formally consulted? Their assessment of operational access, water supply, evacuation requirements and combined hazard response capability should be mandatory before determination.

6. RESIDENTIAL AMENITY IMPACTS

The proposed operating regime (5am-6pm, seven days per week, with tankers "potentially arriving outside these hours") represents severe intensification compared to the previous service station use, affecting over 1,000 homes.

Noise impact:

During the applicant's unauthorised December 2024 operation, residents experienced:

- Constant HGV noise from early morning including diesel engines, reversing alarms, air brakes and idling
- Loading pump operation
- Weekend disruption
- Loss of reasonable enjoyment of homes and gardens

No adequate noise impact assessment has been provided. The proposal clearly violates NPPF paragraph 185, which requires developments to "mitigate and reduce to a minimum potential adverse impacts resulting from noise" and "avoid noise giving rise to significant adverse impacts on health and quality of life."

Odour and air quality:

Residents experienced pervasive fuel odours during the December operation, affecting footpaths adjacent to the site and penetrating into homes in nearby streets. Exposure to volatile organic compounds (VOCs) from fuel storage and transfer operations presents documented health concerns.

No air quality assessment has been submitted despite the storage and handling of volatile petroleum products. An air quality impact assessment including VOC emissions and odour dispersion modelling should be mandatory.

Visual impact and character:

The development would introduce industrial-scale fuel tanks, security fencing, and 24-hour security lighting, fundamentally altering the semi-rural gateway character between Twyford and Charvil settlements.

7. PUBLIC HEALTH IMPLICATIONS

The well-documented Bramley, Surrey fuel leak incident demonstrates the serious public health consequences of fuel storage

failures: Contaminated water supplies affecting multiple properties; Underground fuel migration through soil and groundwater systems; Explosion risk from vapour accumulation in confined spaces; Health effects from chronic fume exposure; Years of investigation and remediation; Significant property devaluation;

These risks are amplified at the Charvil site due to flood susceptibility, immediate watercourse proximity, high groundwater table, dense residential population, and recreational use of adjacent nature reserve.

The application provides insufficient detail regarding tank specifications, condition and inspection protocols, leak detection and monitoring systems, groundwater monitoring proposals, emergency response procedures and equipment, staff competency requirements, and long-term environmental liability insurance.

8. GROUND CONDITIONS AND STRUCTURAL SUITABILITY

The applicant's proposal includes extensive ground stabilisation works (concrete block retaining walls and limestone-filled gabions), explicitly acknowledging the site is constructed on "made ground."

This admission reveals fundamental unsuitability for heavy fuel storage infrastructure. Made ground typically comprises variable fill material with poor compaction characteristics, creating risks of:

- Differential settlement causing tank and containment structure failure

- Cracking of bunds during ground movement
- Underground void formation and collapse
- Uncharacterised contamination from previous site uses
- Preferential groundwater pathways through disturbed material

Has an adequate geotechnical investigation been undertaken? The submission should include detailed ground investigation reports, bearing capacity analysis for laden tanks (potentially exceeding 100 tonnes when full), contamination assessment and remediation strategy, and foundation design calculations.

The requirement for extensive stabilisation works demonstrates this site is inherently unsuitable for infrastructure requiring long-term structural integrity.

9. APPLICANT CONDUCT AND REGULATORY COMPLIANCE

The applicant commenced operations at this site in December 2024 without planning permission, installing fuel tanks, accepting deliveries, and subjecting residents to noise, odours and traffic impacts. Operations only ceased following enforcement intervention. This demonstrates concerning disregard for regulatory processes and raises legitimate questions about future compliance with any conditions imposed. If planning requirements were ignored, what confidence can the Council have in operational compliance with environmental permits, working hours restrictions, or vehicle movement controls?

10. LACK OF DEMONSTRABLE COMMUNITY BENEFIT

The applicant has failed to demonstrate:

- Why this environmentally sensitive location is necessary - That alternative suitable industrial sites are unavailable
- Genuine local employment benefits (company headquarters in Lancashire)
- How this development serves community rather than purely commercial interests

Multiple residents have identified superior alternative uses,

particularly car parking for Twyford Station to serve the Elizabeth Line. This would provide genuine community benefit (supporting local commuters, reducing congestion, generating council revenue) with zero environmental risk.

Other appropriate alternatives include small business/office units supporting local employment, community facilities, or residential development compatible with the surrounding area.

11. INADEQUATE STATUTORY CONSULTATION

Review of the planning file reveals unclear consultation status with critical statutory bodies:

- Environment Agency: Formal approval required for fuel storage installation and surface water discharge to River Loddon
- Health and Safety Executive: Consultation role for major hazard developments near residential areas
- Natural England: Assessment required for impacts on European Protected Species and nationally rare species
- Fire and Rescue Service: Assessment of emergency response capability and evacuation planning
- Thames Water: Groundwater protection and water quality monitoring

These consultations should be completed and responses publicly available before determination. The Council cannot lawfully determine this application without proper statutory consultation.

12. QUESTIONS REQUIRING ANSWERS BEFORE DETERMINATION

I formally request written responses to the following:

1. Has the HSE assessed the combined fire risk between the fuel depot and adjacent tyre warehouse?
2. Has the Environment Agency approved surface water discharge to the River Loddon from a petroleum handling facility?
3. What flood levels are predicted over the next 30 years incorporating climate change projections, and do tank/bund heights provide adequate freeboard?
4. Has Natural England confirmed no adverse impacts on European Protected Species and nationally rare species?
5. Has the Highways Authority conducted a Stage 1 Road Safety Audit, and what is their formal position?
6. What evacuation plan exists for nearby residents in the event of fire, explosion or toxic release?
7. What alternative sites were assessed, and why is this location considered appropriate despite obvious constraints?
8. What enforcement action was taken regarding unauthorised December 2024 operations, and how does this affect assessment of applicant credibility?
9. What environmental liability insurance coverage exists, and what guarantees exist for long-term remediation funding?
10. Has the Fire and Rescue Service confirmed capability to respond to major fuel fire at this location?
11. What long-term groundwater monitoring will be required, who will enforce it, and how will it be funded?
12. How will operating hours be enforced when the application states tankers may arrive "outside" specified hours?

13. POLICY CONFLICTS

This application conflicts with planning policy at multiple levels:

National Planning Policy Framework:

- Para 97: Fails to adequately assess risks and promote public

- safety - Para 174: Ignores cumulative effects of development
- Para 183: Site unsuitable given likely pollution effects
- Para 185: Creates significant adverse impacts on health and quality of life through noise
- Para 195: Fails to conserve and enhance biodiversity

Twyford and Charvil Neighbourhood Plan (May 2024):

- Direct contradiction of traffic reduction objectives
- Failure to protect wildlife-rich habitats

- Conflict with policies protecting residential amenity and rural character

Wokingham Borough Local Plan:

- Policies protecting rural character and settlement separation
- Environmental protection policies for watercourses
- Highway safety and sustainable transport policies

14. PRECEDENT IMPLICATIONS

Approval would establish dangerous precedent for further industrial intensification, potentially leading to cumulative degradation of this transitional zone between Twyford and Charvil. The Council must consider the long-term implications of incremental industrialisation destroying the semi-rural character that residents value and that planning policy seeks to protect.

SUMMARY OF OBJECTION GROUNDS

- Unacceptable environmental contamination risk to protected habitats and species
- Inevitable fuel spillage during flood events given documented site history
- Inadequate assessment of combined fire hazard with adjacent tyre warehouse
- Highway safety risks to vulnerable users on substandard structure
- Severe residential amenity impacts through noise, odour and character change
- Demonstrable applicant non-compliance with planning regulations
- Superior alternative uses providing genuine community benefit
- Inadequate statutory consultation with relevant bodies

- Multiple conflicts with planning policy at all levels

- Setting of dangerous precedent for inappropriate development

REQUEST FOR REFUSAL

I respectfully request the Planning Committee refuse this application on the grounds set out above.

Should the Committee be minded to approve despite these objections, I

request:

- Completion of all statutory consultations with responses made public
- Independent combined fire risk assessment
- Public meeting for community presentation of concerns

- Site visit by Committee members
- Written responses to all questions raised above

This represents inappropriate industrial development in an environmentally sensitive residential location. The risks to public safety, protected wildlife, and community wellbeing far outweigh any benefits. There is no compelling justification for approval. Yours faithfully,

Amanda Rutter

