

PLANNING REF : 252782
PROPERTY ADDRESS : 14 Simmons Fields
: 14 Simmons Fiel Charvil, Reading, Berkshire
: RG10 9UW
SUBMITTED BY : Mr Robert Southgate
DATE SUBMITTED : 02/12/2025

COMMENTS:

Formal Objection to Planning Application: Proposed Fuel Depot, Old Bath Road

I wish to register a formal objection to the above application. The proposal is wholly incompatible with national planning policy, the Local Plan, and fundamental principles of public safety and environmental protection. It must be refused for the reasons set out below.

1. Fundamental Unsuitability of Industrial-Scale Fuel Storage Adjacent to Residential Areas and a Nature Reserve

The storage of approximately 837,000 litres (711 tonnes) of hazardous fuels including kerosene, diesel, gas oil, heating oil and HVO is an industrial-scale operation being placed directly beside a residential community and adjacent to the River Loddon nature reserve.

This conflicts with:

- NPPF para. 187-188, which require avoidance of unacceptable risks from pollution and hazardous industrial uses.
- Local Plan policies on spatial strategy, which direct major hazardous installations away from residential and environmentally sensitive locations.
- The Control of Major Accident Hazards (COMAH) principles, which emphasise separation distances between hazardous storage and sensitive receptors.

The site selection alone is demonstrably inappropriate and places residents at unnecessary risk.

2. Severe and Unacceptable Highways and Road Safety Impacts

The application anticipates 132 vehicle movements per weekday, including 59 HGV and 42-tonne articulated tanker movements.

Key highways concerns include:

- The turning paths shown require HGVs to cross into the opposite carriageway on a bend, presenting an immediate collision hazard.
- NPPF para. 111 is clear: development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety. This threshold is clearly exceeded.
- Existing road constraints narrow carriageway, poor visibility, and obstruction from vehicles at the adjoining tyre depot already compromise the road. HGV tankers will exacerbate this to an

unacceptable degree.

- This road is used heavily by pedestrians, children, cyclists and commuters. The resulting conflict is unavoidable and dangerous.

The highways impacts alone constitute grounds for refusal.

3. High Risk of Environmental Pollution, Water Contamination and Flooding

The site is known to be:

- Composed of made ground with instability,
- Prone to high groundwater levels and flooding, and
- Immediately adjacent to the River Loddon SSSI/SINC and surrounding lakes.

The proposal includes a surface water discharge and treated effluent outfall directly into the River Loddon, creating:

- A clear conflict with NPPF para. 174-180, which requires protection of biodiversity and prevention of pollution.
- A breach of Local Plan policies on water environment and ecological protection, which mandate safeguarding of designated sites.
- A scenario in which any future fuel leak statistically inevitable over the lifetime of a depot would result in major ecological harm.

A hazardous fuel depot at a known flood-risk site is fundamentally incompatible with safe environmental practice.

4. Flawed and Misleading Biodiversity and Site Suitability Claims

The claimed 14% biodiversity net gain is unsupported and appears to rely on token planting of a small number of trees and shrubs. This does not meaningfully offset the ecological harm or meet the intention of NPPF para. 179 or Environment Act 2021 requirements.

Furthermore:

- The proposal for concrete retaining walls and limestone gabion structures to stabilise the ground is an implicit admission that the site is unsuitable for heavy industrial infrastructure.
- These engineered interventions further damage landscape character and contradict Local Plan landscape and character policies.

5. Conflict With Local Character, Policy Framework and Proper Planning Practice

Twyford and Charvil are established residential and semi-rural communities, not industrial fuel-distribution zones. Introducing a major hazardous installation:

- Conflicts with Local Plan policy CP1 (sustainable development), CP3 (character and amenity), and CP11 (development outside settlement boundaries).

- Results in a significant loss of residential amenity, contrary to the NPPF requirement that planning decisions safeguard health, quality of life, tranquillity and local character.
- Raises serious concerns regarding the proportionality and objectivity of pre-application advice reportedly given to the applicant. Regardless, the committee must base its decision on planning merit, and the proposal clearly fails to meet policy requirements.

Conclusion

This application presents multiple, serious, and irreconcilable conflicts with national and local planning policy. It poses:

- Unacceptable risks to public safety,
- Substantial highways dangers,
- High potential for environmental contamination,
- Inadequate biodiversity mitigation, and
- Irreversible harm to local character and community wellbeing.

For these reasons, I urge the Planning Committee to REFUSE the application in full.