

PLANNING REF : 252782  
PROPERTY ADDRESS : 49 Colleton Dri 49 Colleton Drive  
: Twyford  
: RG10 0AU  
SUBMITTED BY : Mr David Masters  
DATE SUBMITTED : 09/12/2025

COMMENTS:

I wish to register my strong objection to the proposed redevelopment of the Whitebridge Garage site on the grounds of unacceptable environmental risk, documented hydrocarbon contamination, flood vulnerability, and highways unsuitability for intensified commercial use.

1. Hydrocarbon Contamination and Spillage Risk - High Environmental Sensitivity

The applicant's own Phase I & II Geo-Environmental Risk Assessment confirms active hydrocarbon contamination below the site. Specifically:

Visible and olfactory hydrocarbon contamination was identified in boreholes WS7 and WS8, directly adjacent to the old fuel tanks. Groundwater was encountered at just 1.3-2.3m below the surface, giving spilled contaminants a direct pathway into the groundwater system.

The site lies within Source Protection Zones SPZ2 and SPZ3, where groundwater is classed as highly vulnerable.

The proposed redevelopment would intensify vehicle movements, fuel handling, and commercial activity, substantially increasing the likelihood of further oil and hydrocarbon spillages.

This is particularly dangerous because:

The adjacent country park, lake, and river corridors act as natural collection basins where pollutants can accumulate. Flooding events which are common would rapidly mobilise hydrocarbons across the country park, footpaths, and public water bodies.

No credible spill containment, flood-activated cut-off measures, or ground remediation proposals have been submitted.

Given the established contamination and extremely shallow groundwater, any additional hydrocarbon loading represents a serious risk to controlled waters, public amenity, and ecological receptors. On these grounds alone, the development fails the requirements of the NPPF and Environment Agency groundwater protection policies.

## 2. Flood Risk - Adjacent to Floodplain Country Park with Documented Flooding

The site sits immediately beside a country park known to flood. The environmental report identifies:

Parts of the plot as Flood Zone 2 and Flood Zone 3.  
Groundwater flooding potential at surface level.  
A seasonal high water table within 1-2 metres of ground level.

Increasing hardstanding or commercial intensity on this site will:

Displace floodwater into the country park and nearby homes;

Increase surface water runoff into the Old River and lake;  
Mobilise existing and future contaminants into public recreation areas.

The flood risk assessment provided is insufficient, does not consider contamination mobilisation, and does not reflect the lived flooding reality of local residents, the park, and the surrounding walking routes.

### 3. Highways Impact - Old Bath Road Is Not Suitable for Intensified Commercial Traffic

Old Bath Road is a narrow rural road, historically serving light local traffic. It is not designed for HGVs, vans, or high-frequency commercial movements. The proposal introduces:

Frequent two-way van and HGV access;  
Turning manoeuvres onto a constrained road;  
Additional noise, emissions, and safety hazards.

There is no safe method to widen, signalise, or upgrade the route without encroaching on green space and the country park boundary. The impact on pedestrian safety, cyclists, dog walkers, and visitors to the park is unacceptable. The transport assessment significantly underestimates both volumes and risks.

### 4. Conflict with Local and National Policy

The proposal conflicts with:

NPPF Sections on Flood Risk, Groundwater Protection, and Pollution Control  
Local Plan policies protecting green infrastructure, recreational land, biodiversity, and watercourses  
Highways policies requiring safe and suitable access for all users

The significant environmental risks, combined with inadequate

highways capacity, mean the development fails to meet the "safe, suitable and sustainable" threshold required for approval.

## Conclusion

This development poses unacceptable risks to groundwater, the adjacent country park, local residents, and public safety. The combination of:

Confirmed hydrocarbon contamination,

High likelihood of spillage migration,

Floodplain adjacency,

Extremely shallow groundwater,

And wholly inadequate road infrastructure,

means the proposal is unsuitable for this location and should be Rejected