

Mr A Church
Charvil Fishing Society
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Objection to planning application No. 252782
Address, Former Prince Brothers Service Station Old Bath Road Reading RG10 9QJ

To whom it may concern,

As the fishery Manager & one of the 2 lease holders for the 2 lakes within Charvil Country Park I am writing to register my **strong objection** to the proposal by Speedy Fuels to develop the old "Prince Brothers" site at on the Old Bath Road, Charvil into a fuel storage and distribution centre by Speedy Fuels Ltd.

I cannot think of a more unsuitable location for such a facility, nor could anyone else I suspect.

This **objection** is both personal and on behalf of all 60 members of the Charvil Fishing Society which leases the access and fishing rights to Canberra and Orrell Lakes and 600m of The Old River Loddon, within the Country Park. We have held this lease since 2010 and have recently renewed it for the next 10 years. Operating as a not for profit organisation, over that period of time we have invested a great deal of time, work and money into improving the fish stocks in the lakes, into maintaining and improving access and paths for all users of the country park and in general, maintaining the appearance of the country park. I personally have been angling in the lakes since I was a teenager in the late 1980's and to see anything detrimental happen to the wider environment and our incredibly valuable stock would be heartbreaking. The lakes have a huge head of our Carp, Tench, Bream, Roach, Rudd, Perch and Pike. The stock of Carp in particular are worth tens of thousands of pounds, including some very large and highly sought after fish. This stock has been built up over many years through our stocking and growing on program. The loss of any one fish let alone more would be tragic. Our members fish the lakes 24/7 throughout year as do the members of the local Charvil Angling Club. Many, many hours of work is carried out by our management team and members around and on the lakes and in the country park as a whole to maintain access for all park users and our anglers and improve the bio diversity of the environment. Angling is very well recognised as a huge benefit to mental health. The ability to fish through the night in a tranquil and natural environment is very very important. The amenity value of the country park to the collocal community as well as visitors from further afield cannot be underestimated. This application if allowed will compromise that completely.

I would refer you at this point to my other objection document submitted 2/2/25 containing historic press articles setting a precedent for the refusal of applications on this site and on the area that now forms the country park anglers car park. Those applications have all been turned down largely due to the massive adverse effects such development would have on the rural nature of the area.

The noise, fumes and light pollution will completely ruin the amenity value of the country park.

The objection is based on several issues. These being

1. The proximity of the site to the Old River Loddon, Charvil Country Park and the lakes
2. The risk of an accident / spill on site and the resulting potential for a disastrous pollution event
3. The flood risk and resultant pollution risk
4. The physical unsuitability of the site for this proposed use
5. Proposed operating hours / Public Health and Safety Concerns
6. Noise, light and air pollution
7. The danger to all road users entering / exiting or passing the site on the Old Bath Road
8. Conflict with Local planning policies

I have fully read and digested all of the documents submitted as part of this application. Of note are the Phase 1 and 2 Geo Environmental Survey commissioned by the previous owners in March 2022, The Flood Risk Assessment, The Transport Assessment, The Ecological Impact Assessment, the drainage plans and the lighting plans.

1. Proximity to lakes, water courses and Charvil country park

Charvil country park is a vital local resource for residents, visitors and anglers alike, for both physical and mental wellbeing. It is an irreplaceable wildlife reserve and home to a vast array of aquatic, bird, animal and plant life, including otters, badgers and deer. A huge number of bats and amphibians, including newts, are present in Charvil country park.

Canberra lake lies just 8 metres from the southern boundary of this site. At this 8m location begins a large Norfolk Reed Bed, planted some years ago and funded by an EU grant to increase bio diversity. This reed bed is a habitat used by a myriad of wildlife, not least of which, our resident pair of swans whose nest lies no more than 15metres from the proposed fuel depot site.

Work is also underway further around the north end of the lake in the North Eastern corner by WBC to again hugely improve bio diversity with the planting of another 100m long reedbed. To then allow this application **directly** threatens all of these bio diversity gains, due to heightened pollution risk , as elaborated in the following paragraphs plus actual pollution impacts from noise , light and odour.

This proposed facility is incompatible with the ecological and recreational land use of Charvil Country Park.

Charvil Country Park and Charvil Meadows are designated as a public green space and wildlife reserve that supports biodiversity, promotes public well-being, and provides recreational opportunities. The operation of a fuel facility:

- Contradicts the core purpose of the park;
- Threatens local flora and fauna, including fish stocks, amphibians, birds, and invertebrates;
- Diminishes the natural character of the park through noise, odour, and light pollution;
- Risks driving away visitors, anglers, and all other local users due to industrial intrusion.

Such a development undermines the environmental value and public trust invested in maintaining the site as a protected natural asset.

2. The risk of an accident / spill on site and the resulting potential for a disastrous pollution event.

Any accidental leak or spill on this site would be catastrophic, especially in the event of an accident or spill on site. During flood conditions it is clear that there would be rescue and remediation difficulties. Fuel spills in waterlogged or flooded areas would be impossible to contain and clean, the environmental cost would be disastrous. A leak during a flood event would infiltrate soil and enter groundwater systems, causing long-term, irreversible damage. A fuel spill due to flooding would contaminate the adjacent lakes and The River Loddon and The River Thames, severely damaging aquatic ecosystems and killing fish and other wildlife.

Despite the mitigation measures proposed, in the case of an uncontrollable leak or spill, maintenance to be overlooked or failure of / damage to the attenuation tank, the consequences for the Country Park, lakes & River Loddon would be irreparable. The proposed 30 cm bund at the perimeter would not be able to contain such a spill in flood conditions. There is no such thing as a leak proof tank, all tanks fail either from underground pressure, accident or eventually corrosion. All need replacement on average within 20 to 30 years and that would involve further disturbance of the unstable ground that has contaminants locked within it, releasing them into the environment.

2.1 Fire risk.

This has very well highlighted in other objections already lodged. Should a fire occur either on this site or the adjacent bulk tyre storage depot the results would be catastrophic.

This does not appear to have been considered or risk assessed properly at all. Emergency services response time / access especially in a flood situation could be severely compromised and the containment measures proposed would in no way be able to contain the amount of water used by the fire service in such an event meaning certain massive contamination of the lakes / river and country park.

3. The flood risk and resultant pollution risk

This entire site lies within flood zone 3 with a small proportion artificially raised to be classified as zone 1 or 2.

Following on from point 2 above, the proposed site-use poses an inherent Environmental Risk and Flood Vulnerability. The proposed site lies within a known floodplain. Installing fuel storage tanks in such a location presents an unacceptable risk of contamination during flood events, including:

- Leaching of hydrocarbons into adjacent water bodies;
- Irreparable damage to aquatic ecosystems in the nearby lakes and river;
- Soil and groundwater contamination with long-term public health implications;
- Amplified difficulty of emergency response and containment during flood conditions.

Given the increasing frequency of extreme weather events due to climate change, this risk is only expected to escalate.

As stated I have spent a great deal of time in the country park over many years and all seasons. The incidents of very widespread flooding there are increasing in numbers and duration year on year. Last winter the Old River Loddon breached its banks on at least 3 separate occasions into Canberra lake causing the entire area to be flooded. The flood water reaches the entire southern boundary of this site and continues to achieve higher levels up the side of the 'made ground' on which the site stands. I have stood on the path between the north end of Canberra and the sites southern boundary in chest deep water on many occasions. It is only a matter of time before we have an event where the site is inundated with flood water.

The 2014 flood mapping attached below shows that flooding of the site is a real concern.

The applicants submitted Flood Risk Assessment is completely flawed and glosses over any flood risk merely addressing the assertion that the site would not increase risk of flooding elsewhere. The NPPF is very clear that in this case a Sequential and Exception test should be applied. This section is listed in the index for their document but the section is actually **completely missing** from the document.

Last winter, the UK was hit by six named storms. Among them, storms Bert and Connall caused severe flooding in England during November 2024.

Winters are also getting wetter, according to the Met Office.

Six of the 10 wettest winter half-years (October to March) for England and Wales have been in the 21st century so far.

Incidents of groundwater flooding, river (fluvial) flooding, surface water flooding, sewer flooding and highway flooding have impacted the region both historically and in recent years.

Flooding is likely to become more frequent due to climate change and increasing financial pressures on risk management

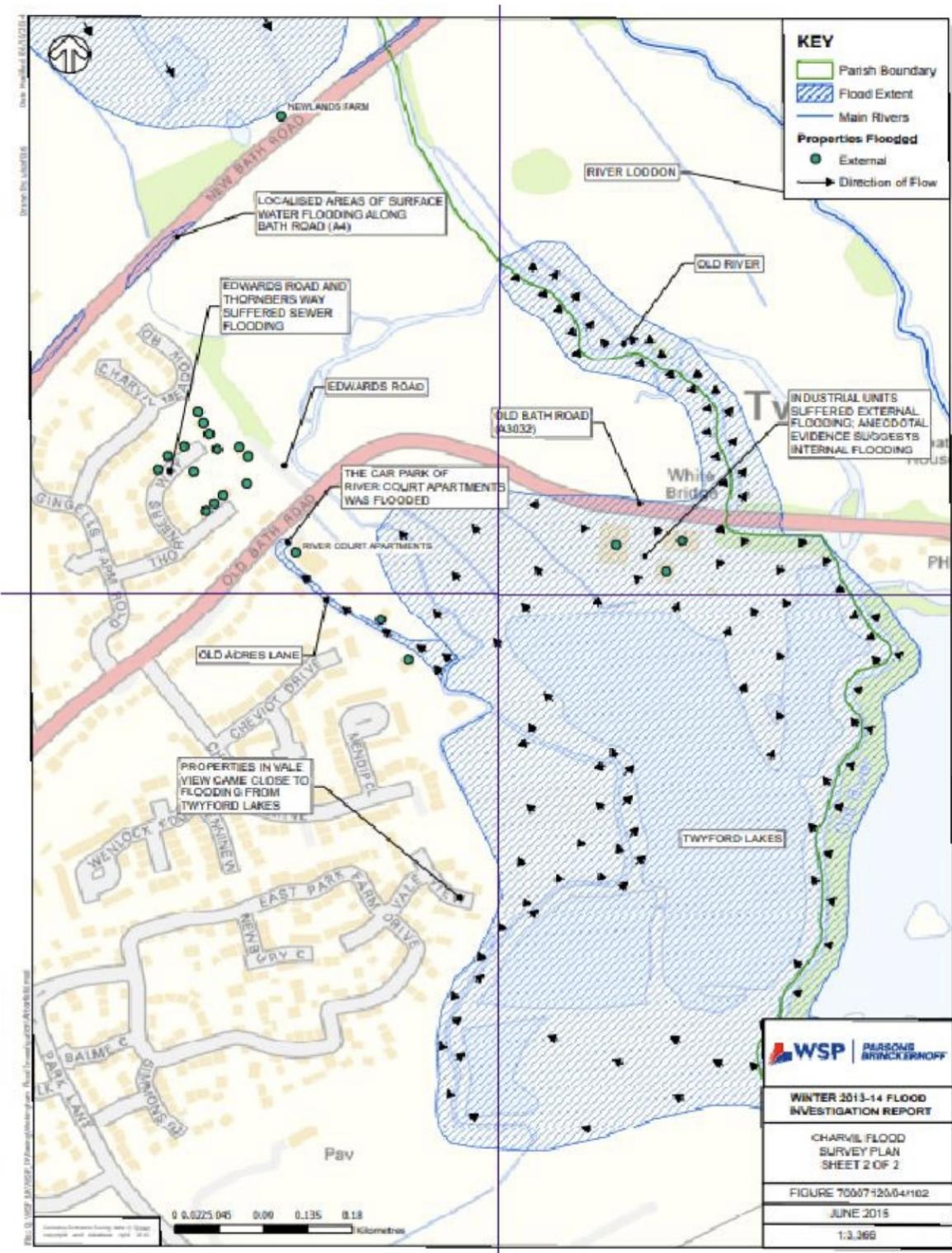
Photographs of flooding on path between lake and site



Photograph illustrating subsiding flood water up to site boundary and the unretained made ground on which the site stands with fuel tanks in situ



Flood Extent Mapping commissioned by WBC showing the site inundated during 2014 flood event



4. The physical unsuitability of the site for this proposed use

I will be referring to the Phase 1 and 2 Geo Environmental Survey commissioned by the previous owners in March 2022.

The following are all lifted from that report and highly relevant to refusing this application.

"The Envirocheck report indicates that the north-east of the site is located within an Environment Agency Total catchment (Zone III) Source Protection Zone (SPZ3). An Environment Agency outer protection zone (Zone II) Source Protection Zone (SPZ2) exists 7m to the north of the site."

"The nearest surface water feature is indicated 2m to the south-west consisting of a drainage ditch. The nearest main river (or inland river) comprises the Old River 28m to the north-west of the site. The nearest lake is 8m to the south of the site."

"The Envirocheck report indicates that an area of 'extent of flooding or extreme flooding from river without defences' exists on the site. The site is not located in an area that benefits from flood defences"

"Information from the GOV.UK website (February 2022) indicates that the north-west of the site is located within a Flood Zone 3. An area running from the middle to the east of the site is within a Flood Zone 1 and the remainder of the site is located within a Flood Zone 2. Flood Zone 1 is described as: 'land and property in flood zone 1 which has a low probability of flooding'. Flood Zone 2 is described as 'Land and property in flood zone 2 have a medium probability of flooding'. Flood Zone 3 is described as: 'Land and property in flood zone 3 have a high probability of flooding'"

There are no surface water or foul water sewers on site at all that are connected to the public system. The proposal is for this surface run off water including that generated in the vehicle wash down area to be collected in a very large attenuation tank buried in the site, as well as a foul water treatment tank, and for this water to then run out into the Loddon via an outfall pipe. This is not appropriate for the River Loddon, or indeed the River Thames just miles downstream.

The survey concluded that there was **VOC and TPH ground contamination** from previous uses of the site and that any disturbance to this ground would risk release of these into the wider environment.

The excavations required for these underground tanks and associated pipes **will** disturb this contaminated ground.

The survey found that the site is elevated on 'made ground' ie backfill likely excavated from the site immediately to the west over soft alluvium. This made ground extends to between 1.3m and 2m below ground level. It is clearly visible around the southern edge of the site that the site sits on this material with absolutely no retaining wall at all.

Upon examining the plans it is clear that the use of the site, if allowed, will have a huge amount of weight on it from the fuel tanks and vehicles. The survey found the made ground to be unstable, subsiding and cracking. Hardly the ideal surface for a fuel storage depot. Fuel storage tanks have already been sited around the perimeter of the site above this unsupported made ground as per the photos attached.

Clearly acknowledging that the site is unstable, the plans for the site do include gabion retaining walls which it appears from the plans would need to be located external to the sites perimeter within the country park itself and no doubt requiring clearance of trees & the wet woodland and other vegetation to install. This will further reduce screening of the site and the applicant appears to have assumed access / use of ground not actually belonging to the site will be allowed. In particular I refer to the use of WBC owned land across which they want to install the outflow pipe into the River. The gate which this would block access to is in constant use by visitors accessing the park on foot and by bicycle as well as anglers driving vehicles into the car park.

The amount of excavation required to install the attenuation tank and other equipment will surely only serve to further destabilise the site. The water table is so close to the surface of the site that the bore holes made during the survey filled with water and elevated groundwater was measured to 1.3m bgl. This level will only increase during flood episodes.

They further noted the instability of the made ground and the potential for lateral heave of the clay layer beneath and that piling would be required to stabilise the site for redevelopment. The potential for ground collapse in excavations is high which would further destabilise the concrete slab.

"Due to the requirement for excavations to facilitate the construction, and the potential for coarse soils and increased thicknesses of MADE GROUND locally, care should be taken to ensure that instability of excavations does not affect existing structures and services (e.g. foundations, roads, boundary walls or buildings) both on and off-site"

Speedy Fuels have already made excavations on the site which were observed to have quickly reached the water table. So they have already disturbed the contaminants in the made ground. This only provides another reason why this site is completely unsuitable for this proposed use.

There are also untraced pollution pathways on site which would allow any contaminant runoff to go straight into the water table and, as discussed below, directly towards the lake.



Photograph showing excavation made by Speedy Fuels, earlier this year, full of groundwater on southern side of site.

The survey also concluded that;

"Thus with the groundwater data available it would appear groundwater is migrating in the southerly direction

towards the lake; which is considered to be a natural 'sump' and thus hydrogeologic draw to groundwater"

Highlighting that any contamination of the groundwater on the site would make its way to the 'natural sump' created by Canberra lake.

5. Proposed Operating Hours / Public Health and Safety Concerns

The previous hours of operation from this site were Monday to Friday 9am to 5.30pm. The proposal is to run from 5am to 6pm ordinarily, but with some vehicle movements happening up to 2am. The operation will also be seven days a week, with reduced operating hours at the weekend and at Bank Holidays. Consequently, many more

people will be affected by this site in their leisure time; so, there will be more noise and disruption at weekends when using the country park, fishing and walking on the neighbouring paths, adversely affecting the quality of life of many who like to enjoy the peace and quiet of the area. This would be contrary to CP3, and NPPF paragraph 185, in that this will impact negatively on the residents' enjoyment of the countryside.

Operating a fuel depot near a public amenity endangers local residents and visitors. The constant operation (21 hours daily) increases the likelihood of:

- Accidental spillage, fire, or explosion;
- Exposure to toxic vapours, especially in low-lying flood-prone areas;
- Road hazards from increased heavy vehicle traffic on park access routes;
- Night-time disturbances and light pollution adversely affecting both human and animal populations as below.

6. Noise, light and air pollution

I acknowledge the plan for 25 x 8m high light poles with LED lighting, I note that these will be downlights to minimise light spread outside the site, however it will have a huge effect on the wildlife in Charvil country park and lake. For those of us who use the lakes for angling throughout the hours of darkness, this will cause a significant deterioration of this local amenity and a harmful change to the areas character.

As it is well known the company began operating on site as soon as they acquired it without the proper permissions until planning enforcement was carried out and they were stopped. During this time the shape of things to come, if this application is allowed, were clearly evident. They did this without any of the relevant mitigation measures they now assure they will put in place, clearly demonstrating a complete disregard for proper procedure and environmental protections.

The noise from the site was intrusive in the country park and the stench of fuel fumes was evident and overpowering around the entrance to the country park, in the anglers car park immediately adjacent to the east of the site and around the whole northern end of the country park. This alone, and the detrimental effect it was having and will continue to have on wildlife and country park users would ruin Charvil country park.

7. Danger to road users

The application projects 59 daily HGV movements plus additional car and van movements to around 73 in total. The transport assessment asserts this is similar to the previous use. I disagree in both volume and the type of vehicles projected to be using the site.

I have been entering and exiting the vehicular access to the country park and the anglers car park immediately adjacent to the western entrance to this site for many years. It is a busy road, a bus route, and has a high frequency of cyclists and pedestrians of all ages negotiating the narrow pavements.

The visibility splay to the east cannot achieve the required 53.5m for the surveyed 36 mph 85th-percentile speed at 27m is severely limited as noted in WBCs own pre-planning application advise letter dated 8th November 2024. This combined with frequent excess speed of vehicles approaching from the east, who also have extremely limited visibility approaching the entrance over the White Bridge, means that exiting the site, especially in a slow moving heavily laden articulated tanker is a huge accident risk. The Parish Council recently completed speed monitoring further to the west in the 30mph restricted zone and recorded a highest speed of 88mph. From personal experience when entering the site turning in having approached from the east, vehicles have approached at alarming excess speed from behind making no allowance for a potential slowing vehicle turning into the site. This again will be exacerbated by slow moving articulated vehicles turning in having approached from the west and having to cross the opposing carriageway into the site.

I note the transport assessment's assertion in the swept path analysis that vehicles exiting the site will not cross into the opposite carriageway and can pass each other safely entering and exiting. I do not believe this to be true and the swept path analysis diagram clearly shows the offside of an exiting vehicle crossing the centre line into the east bound carriageway.

Again from personal experience when turning out of this location onto the Old Bath Road in either direction is a high risk manoeuvre due to this limited visibility splay, the excess speeds and lack of planning on a large number of vehicular road users part.

Whilst the site was operating before being closed down, the chaos and these highly dangerous risks at the entry / exit point to the Old Bath Road were also clear to see. With often multiple HGVS stationary on the westbound carriageway unable / waiting to enter the tyre facility to the west of this site, the already limited visibility splay to

the east was non-existent. Vehicles travelling west are forced to cross into the opposing eastbound carriageway towards a blind bend. Fuel tankers were observed leaving the site with no visibility at all to the east and fully entering the eastbound carriageway in turning out to travel west. Please see photos attached below. The photo showing the tanker leaving site is taken from a film clip, which shows the white van having to brake to a halt as it came round the bend and was faced with the tanker. Several other vehicles are then also observed having to brake to a halt with increasingly limited visibility as they approach from the west. This image illustrates perfectly how the assertion that incoming and departing articulated vehicles can safely pass each other unhindered is untrue.

If this application is allowed the nature, volume and operating hours of the vehicles using the site in the numbers described in the application **will** cause a serious accident and injuries or fatalities.

Photograph showing parked HGV outside tyre depot forcing westbound traffic (bus) onto opposing carriageway approaching unsighted bend



Photograph showing Speedy Fuels tanker exiting site fully occupying opposing carriageway forcing oncoming vehicles to brake to stop. (Video footage available)



8. Local and National Planning

This proposal conflicts with:

- Wokingham Core Strategy Policy CP7 (Biodiversity), which protects the integrity of wildlife sites and biodiversity.
- Policy CP11, which seeks to safeguard the countryside from inappropriate development.

This site if allowed would disrupt early mornings, evenings and weekends, directly affecting residents' ability to enjoy their homes, gardens and nearby green spaces. The expanded noise levels conflict with policy.

If contradicts CP3 and NPPF 185, which aim to protect residential and countryside amenity.

- The combination of hazardous substances and proximity to homes, schools, and a nature reserve runs against the emphasis, in the National Planning Policy Framework (NPPF) on directing development to suitable locations and avoiding significant harm to people and the natural environment.

NPPF Paragraph 116 Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the cumulative impacts in the road network

NPPF Section 170. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).

NPPF Section 174. Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.

The sequential test should be used in areas known to be at risk

NPPF Section 187, Which require the protection and enhancement of biodiversity, and state that development resulting in significant harm should be refused.

NPPF Section 193 When determining planning applications, if a development would cause significant harm to biodiversity and that harm cannot be avoided then planning permission should be refused. Development that harms SSSI is generally not allowed unless the benefits outweigh the damage. Any development that would lead to the loss of irreplaceable habitats should be refused. Proposals aimed at conserving or enhancing biodiversity should be supported and all developments should look to improve biodiversity as part of their design

Conflict with Wokingham Borough policy:

- Core Strategy policy CP6 requires development to mitigate significant transport impacts; the TA's own evidence demonstrates the opposite.
- Borough Design Guide NR3 & NR10 expect developments to create a positive impression for all modes and keep servicing unobtrusive; a 24-hour tanker depot on the parish gateway fails these tests.

The pre-application advice letter from WBC raises a number of issues and observations but highlights that these are all made without a full knowledge of the plans for the development of the site under this application. I would hope that all these issues are now fully examined with the full details of the plans and the correct decision is made to refuse this application outright.

One point raised by the Councils Lead Sustainability Planning Officer is that of minimal excavations. However in looking at the proposed drainage plans as well as all the work required to achieve necessary falls on the finished surface an attenuation tank measuring 10m x 39m x 1.2m deep is to dug into the site on the eastern side.

I am also highly concerned that this tank to catch all surface run-off, such as that from a vehicle wash down area, combined with a foul water tank, will then be pumped out via an outflow pipe into the Old River Loddon which is planned to be run across the entrance road to our car park. This land does not form part of the site.

I quote from the letter:

"In the event planning permission is granted, and the exceptions do not apply, paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 grants permission subject to the condition "(the biodiversity gain condition)" and that development may not begin unless:

- a) b) a Biodiversity Gain Plan has been submitted to the planning authority, and the planning authority has approved the plan."

I further quote from the Ecological Impact Assessment:

"4.4.3

The proposals will result in a 0.0% biodiversity net gain, which is below the required 10% net gain target. However, no habitats providing biodiversity units will be impacted by the proposals."

I have read the Ecological Impact Assessment in full and I disagree with its general assertion that this proposed use of the site will not have a negative influence on the habitats within its zone of influence.

I note in the latest application an assertion has now been made that by planting 6 trees some shrub areas and a hedge the net biodiversity gain will be 14%. This

In conclusion:

The proposal for this facility in this location is utterly irresponsible and indefensible. It represents an environmentally reckless, socially regressive, and strategically flawed use of the land. I urge the planning committee to prioritise long-term sustainability, public safety, and ecological preservation by rejecting this development outright.

Yours faithfully,
Andy Church

Fishery Manager / Co-owner

Charvil Fishing Society