

PLANNING REF : 252782  
PROPERTY ADDRESS : East Park Farm Drive  
: Charvil, Twyford  
: RG10 9UG  
SUBMITTED BY : Mrs Elizabeth Hogg  
DATE SUBMITTED : 08/12/2025

COMMENTS:

I wish to add additional points to my previously submitted objection, most notably around potential fire risks and associated hazards;

Fuel Storage and Distribution is a Hazardous Operation (DSEAR 2002 & Oil Storage Regulations 2001) The proposed development involves the storage and handling of flammable or combustible fuels and is therefore regulated by: Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) and Control of Pollution (Oil Storage) (England) Regulations 2001. These statutory controls confirm the site is independently hazardous even before considering neighbouring risks. In addition, the neighbouring site usage provides additional hazards and risks which cannot be ignored and further support the sites unsuitability for fuel storage operations;

The submission only considers the hazards within its own site boundary. It excludes any reference to the neighbouring premises, a tyre storage and distribution facility that adjoins the site at the boundary line. The National Planning Policy Framework (NPPF) requires decision-makers to: "Avoid development that could create unacceptable risks to public safety" (NPPF 97) and Consider "cumulative effects arising from new development" (NPPF 174). By failing to address the adjoining high-risk use, the submission does not provide the LPA with the information needed to assess cumulative fire and safety risk as required under the NPPF.

Tyre Storage Recognised as a High-Risk Use (Environmental Permitting Regulations & Fire Prevention Guidance). The neighbouring tyre warehouse is recognised as a high-risk operation under: Environmental Permitting (England and Wales) Regulations 2016, Environment Agency Fire Prevention Plan Guidance (2018) and National Fire Chiefs Council (NFCC) Waste and Recycling Fires Framework (2017-2023). This establishes that the neighbouring facility is not a general commercial use but a statutory high-risk environment.

Lack of combined risk assessment and Interaction with neighbouring land uses. A hazard arising from two high-risk premises operating side-by-side is clearly a "material consideration". The absence of cross-boundary assessment represents a failure of the applicant to provide information necessary for lawful decision-making. Where risks may impact people outside the premises, "responsible persons" must take reasonable steps to cooperate. There is no evidence in the proposal of any cooperation or joint risk consideration between the proposed fuel site and/or from Speedy Fuels and the existing tyre warehouse, despite both premises posing cross-boundary hazards.

In addition, having re read the proposals, I note the following omissions or errors in the proposal;  
The "Sequential and Exception Test" part of the flood risk and

drainage strategy is absent from the documentation despite being listed in the introduction.

The flood risk assessment contains incorrect information around the use of the site - this states the proposal "comprises a new compressed natural gas (CNG) heaving goods vehicle (HGV) refuelling site with 12 dispensing pumps, providing bio gas vehicle fuel and associated parking infrastructure". However, the description in the covering letter and on the planning site is "Full application for the proposed change of use from service station to a fuel oil storage and distribution facility including demolition of 2 no. existing buildings and a garage and the recladding of the existing building, installation of 8 no. fuel oil storage tanks and construction of retaining structures, plus refurbishment of hardstanding, car parking and other associated works.". Also, across the proposal I see no mention of CNG, I do however note the mention of tanks to store in excess of 800,000 of fuel including diesel and kerosene.

It is widely acknowledged Speedy Fuels began operating from the site in December 2024 without planning permission being granted and were subsequently asked to cease operations. This prior behaviour and now omissions and fundamental inaccuracies in the planning documentation highlights the disregard for what are unacceptable risks to the environment, public health, highway safety and residential amenity. The combination of flood risk, fuel spill danger, heavy-vehicle movements, and harm to Charvil Country Park makes this development entirely inappropriate for the location.

I once again request that planning application 252782 be refused in the interests of public safety, environmental protection and long-term sustainability.