PLANNING REF : 252782
PROPERTY ADDRESS : Katrin.Harding@wokingham.gov.uk
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SUBMITTED BY : Councillor Katrin Harding
DATE SUBMITTED : 08/12/2025

COMMENTS:
1. Introduction
I am submitting this objection to planning application 252782 in my capacity as the elected Borough Councillor for Thames Ward. I have been contacted by numerous residents who are deeply concerned about the environmental, safety, and amenity impacts of this application.
Based on the evidence, I believe the proposal is fundamentally incompatible with national planning policy and with the adopted policies of Wokingham Borough Council. I therefore strongly object. In the event that this application is recommended for approval I would like it reported to Planning Committee for the following reasons:
- Environmental impacts- relating to impact on the country park in 'normal' operation, and potential for environmental contamination especially at times of flood.
- Highways safety and traffic impact.
2. Environmental Harm
2.1 Flood Risk and Unsuitability of the Location
The majority of the site is located in Flood Zone 2, with a portion in Flood Zone 3, and is surrounded by the functional floodplain of the river Loddon. During the 2014 flood event the site was underwater, with anecdotal reports of internal flooding of buildings, demonstrating the predictable and substantial flood risk in this part of the Loddon floodplain. River level data shows an increase in the frequency and level of flooding events
The National Planning Policy Framework (NPPF) requires that highly vulnerable and polluting land uses must be steered away from areas at flood risk through application of the Sequential Test and Exception Test. The proposed use—storage and transfer of hydrocarbons including jet fuel, diesel, and heating oil—is self-evidently inappropriate in a floodplain, where floodwaters can mobilise contaminants with catastrophic consequences.
Wokingham Borough Council's own Local Plan Core Strategy (CP1, CP3, CP7, CP9) and Managing Development Delivery DPD (Policies CC09, CC10, TB23) further emphasise the need to avoid intensifying development in areas of known flood risk, particularly where hazardous substances are involved.
While proposals do include some containment measures to contain and treat any spills and surface water, have these been proven effective in areas of flood? Are sunken attenuation tanks reliable in a site where the groundwater is often very close to the surface?
The applicant's 'Flood Risk Assessment and Drainage Strategy' document contains a number of inconsistencies – most notably that "Section 6.0 considers the Sequential and Exception Tests" listed in the introduction is not in fact included in the submitted document.
3.1.1 incorrectly lists the development as a compressed natural gas refilling site – not a fuel storage and distribution site. The flood risk map is also out of date when

comparing with the current maps from the Environment Agency, which shows most of the site is in Flood Zone 2, and closer proximity of Flood Zone 3. How can the risks and mitigations be properly assessed if the applicant's own documents are incomplete or incorrect?
The applicant has not demonstrated compliance with either the Sequential Test or Exception Test, nor provided a credible assessment of
pollutant migration pathways in flood scenarios. The proposal is contrary to national and local planning policy
2.2 Pollution Risk to the River Loddon, the Thames and Associated Habitats
The site sits just 1.5 miles upstream of the confluence of the River Loddon and the River Thames. The hydrological connectivity means any release of hydrocarbons—whether caused by flooding, over-topping, structural failure or vehicle incidents—could rapidly reach sensitive
watercourses.
The Thames catchment supports priority habitats and protected species, including otters, fish nursery grounds, water voles, and extensive riparian ecosystems. Even small spills can cause long-lasting ecological harm. The submitted pollution prevention measures are inadequate for a site of this sensitivity and do not demonstrate compliance with NPPF Part 15, Core Strategy CP7, or MDD Policy TB23.
The site is underlain by permeable alluvial soils and gravels which allow rapid migration of contaminants. The proposal seeks to store approximately 837,000 litres of fuel products; even
minor failures could result in contaminants entering groundwater or surface waters within hours.
The application provides no cumulative impact assessment, despite the proximity to residential properties, sensitive receptors, and a history of major flooding.
2.3 Amenity
Impacts from Noise, Odour, Light and Air Quality
Long hours of
operation would bring significant noise from HGVs, reversing alarms and loading activities, odours and vapours from fuel handling, and lighting spill into a semi-rural area. When the site was operated in December 2024- January 2025, I personally experienced the odours from loading operations when walking to Twyford via the country park, which were significant enough to cause a brief headache and certainly hurry me out of the affected area – a public country park. Further, have the impacts of light pollution been considered in relation to impact on neighbouring habitats and biodiversity?
These impacts are
inconsistent with MDD Policy CC06 and are likely to materially harm the amenity of the country park.
3. Highways and Safety Impacts
3.1 Limited forward visibility approaching the site
Old Bath Road has substantial curvature and restricted sightlines, particularly when approaching the site from the west. Vehicles travelling at the posted 40 mph speed limit emerge from bends with limited visibility of slow-moving or stationary HGVs, including tankers entering or leaving the proposed depot. The combination of:
• heavy vehicles making wide turns across both carriageway lanes,
• poor forward visibility, and
• a narrow footway immediately adjacent to the carriageway
creates a high-risk conflict point for all road users.
3.2 Existing
obstruction caused by HGVs at Denmark House

The road environment is already compromised by frequent HGV parking at Denmark House (Total Tyres), where large articulated vehicles routinely stop on the roadside while awaiting access. These vehicles block the westbound lane, forcing oncoming traffic into the opposing lane and
significantly increasing collision risk.
This existing behaviour demonstrates:
• the inherent limitations of the road geometry,
• the lack of appropriate off-street waiting space for industrial deliveries, and
• the inability of Old Bath Road to safely
accommodate additional HGV activity.
The introduction of 59 large tankers per week (plus cars/vans) would materially worsen an already unsafe situation. Please see below for photographic evidence of the current challenges.
3.3 Importance of Old Bath Road as an active travel corridor
Old Bath Road is the only direct link between Charvil and Twyford, and is therefore the primary walking and cycling route fo r residents accessing Twyford's:
• railway station,
• schools, pre-schools and nursery,
• health facilities,
• shops and services.
As a result, the route is heavily relied on for everyday active travel. The Old Bath Road is also crossed by schoolchildren travelling to Charvil Piggott Primary and The Piggott School on a daily
basis.
Introducing an intensified HGV presence on a narrow, bend-dominated road with limited refuge space fundamentally undermines the Council's statutory duties to promote active travel under:
• NPPF 117c) – safe and attractive walking and cycling environments;
• Local Plan CP6 – development must not discourage walking/cycling;
• The
Council's Local Transport Plan – supporting active travel on key movement corridors.
3.4 Evidence on HGV impacts on real and perceived safety
There is robust transport research indicating that HGVs significantly increase both actual and perceived risk for pedestrians and cyclists:
• Studies from the DfT and Transport Research Laboratory (TRL) show that HGVs are disproportionately involved in fatal collisions with vulnerable road users, particularly where forward visibility is limited and road width is constrained.
• Research consistently demonstrates that perceived danger from large vehicles reduces active-travel uptake, even when physical infrastructure is unchanged.
• The Manual for Streets and LTN 1/20 highlight the deterrent effect of heavy traffic volumes on walking and cycling, noting that high-frequency HGV movements are incompatible with comfortable or safe pedestrian and cyclist environments.
Introducing daily tanker movements, including 44-tonne articulated vehicles, would therefore undermine the usability and perceived safety of this essential pedestrian and cycling route, contradicting national and
local policy objectives to promote modal shift and reduce reliance on private car use.
4. Policy Conflict Summary
The proposal conflicts with numerous national and local policies,

including but not limited to:
NPPF
• Part 14: Meeting the challenge of climate change, flooding, and coastal change
• Part 15: Conserving and enhancing the natural environment
• Part 9: Sustainable transport
Wokingham Core Strategy
• CP1: Sustainable Development
• CP3: General Principles for Development
• CP6: Managing Travel Demand
• CP7: Biodiversity
• CP9: Flooding
Managing Development Delivery (MDD) DPD
• CC03: Environmental Pollution
• CC06: Noise
• CC07: Lighting
• CC09 & CC10: Flood Risk
• TB23: Biodiversity and Landscape Protection
The conflicts are substanti al, multifaceted, and irremediable.

Conclusion
Given the clear, evidenced risks to environmental safety, flood resilience, public health, highways safety, and community amenity—and given the direct conflict with both national policy and Wokingham's adopted planning policy framework—I urge officers to refuse this application in full.
This location is fundamentally unsuitable for a fuel depot, and no reasonable conditions could make the proposal acceptable.