
Planning Application: 252782 – Former Prince Brothers Service Station, Old Bath Road, Charvil

Submitted by: G.D. Rees (Dr)

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I wish to object to planning application **252782** for the proposed fuel storage and distribution depot at the former Prince Brothers service station on Old Bath Road, Charvil. As a long-time resident of Charvil, I believe the location of the proposed facility is totally inappropriate.

1. Unacceptable proximity to the Old River, Loddon, Charvil Country Park and the lakes

- The site is immediately adjacent to Charvil Country Park, a highly valued public green space supporting otters, deer, bats, amphibians, fish and extensive aquatic, bird and plant life.
- The proposal is fundamentally incompatible with the park's purpose as a wildlife reserve and recreational area.
- Noise, lighting, fumes and industrial activity would erode the tranquillity and natural character of the park, discouraging visitors, anglers and local families.
- Claims of biodiversity "net gain" via planting a handful of trees and shrubs are wholly inadequate compared to the ecological risk created by storing nearly **1 million litres of fuel** on the edge of a nature reserve. This will in no way mitigate the environmental risks highlighted.
- Our family have used the facilities for over 25 years as a wonderful area for exercise and relaxation.

2. Serious pollution and flood-risk concerns: high likelihood of catastrophic environmental damage

- The site lies within a known floodplain and is regularly affected by significant flood events. Recent winters have seen repeated flooding, including water reaching the site boundary.

- WBC reports following the 2014 flood stated that the site was underwater, and anecdotal reports of interior flooding. Similar water levels were observed in 2024.
- Storing diesel, kerosene and other hydrocarbons in this location presents **an unacceptable contamination risk** to:
 - The Old River Loddon
 - Canberra Lake and the country park lakes
 - The River Thames downstream
 - Local soil and groundwater
- If a spill or tank failure occurred during flooding, containment would be impossible. Fuel would spread rapidly through saturated ground and watercourses, causing **long-term, potentially irreversible ecological damage**.
- Given climate change and the increasing frequency and intensity of flooding, the risk cannot be considered manageable or worth taking.

3. Public health and safety risks

Publicised cases of fuel leaks from storage tanks (most notably Bramley, Surrey) have demonstrated the public health risks and resulting consequences, including but not limited to contaminated water, underground explosion risk and fumes, all of which negatively impacted life for residents and local businesses. These risks would be ever present with fuel storage depot operations and not ones which should be taken in Charvil and Twyford.

Site access and operational safety

- The wider area already struggles with heavy vehicles from Denmark House, where articulated lorries are frequently parked hazardously both on the road and pavement.
- Introducing more HGVs exacerbates existing road obstructions and safety issues.
- Tankers turning across both carriageways, as was observed when Speedy Fuels were operating in December 2024, in close proximity to the bend raises serious risk of collision.

4. Fire Risk

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.

5. Highway safety, traffic generation and unsuitable road infrastructure

This proposal greatly intensifies traffic on Old Bath Road with poor visibility and a narrow footpath. Key concerns include:

Volume of tanker and vehicle movements

Estimated weekly movements include:

- **59 x 44-tonne articulated tankers (Mon–Fri)**
- **73 x cars/vans (Mon–Fri)**
- Additional movements at weekends

This is wholly incompatible with a semi-rural residential road used by walkers, cyclists, commuters and schoolchildren. In addition, the road infrastructure is not built for this volume of HGV movements and it is highly likely the road will suffer increased and faster degradation as a result, despite recent resurfacing.

Road safety impacts

- Old Bath Road is the main pedestrian and cycling route from Charvil to Twyford and Twyford Station.
- Children cross Old Bath Road when walking or cycling to school - from the north of the village to Charvil Piggott Primary, and secondary school students travelling from the south of Charvil to The Piggott secondary school.
- There is a substantial risk with the already high footfall and usage of the road, with increased industrial usage, very unfortunately, fatal accidents are likely to occur.
- The corner approaching from the direction of Charvil to Twyford gives very poor visibility when large articulated lorries already visiting the adjacent Denmark House site are waiting on Old Bath Road. Recently, two articulated lorries were parked at the same time on either side of the road giving motorists incredibly dangerous passing problems. The potential added volume of fuel tankers accessing the fuel depot will exacerbate significantly the existing road dangers.

Noise, operating hours and impact on residential amenity

- The proposed operating hours (from **5am to 6pm**, seven days a week, with tankers potentially arriving outside these hours) represent a major intensification of movements and activity.
- This disrupts early mornings, evenings and weekends, harming residents' ability to enjoy their homes, gardens and nearby public green spaces.
- The increased noise is contrary to policy CP3 and NPPF 185 due to harm to residential amenity and countryside enjoyment.

6. Inappropriate land use and failure to justify need

- A fuel depot is an industrial operation and entirely unsuitable for a site so close to a large residential area with over 1000 homes, a nature reserve and public recreation areas for the fire and public safety risks articulated above.
- The proposal represents a major shift from the previous service-station use, with more intensive operations and heavier vehicle movements. It also fails to consider the adjacent operation and the combined use of this site may impact Charvil and/or Twyford.
- The applicant has not demonstrated that this is the right location or that safer, more appropriate industrial sites are unavailable.
- The applicant previously operated on the site in December 2024, without a licence, creating potential harm and demonstrating the possible impact should full operations commence.

This proposal poses **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.

The factors above show that the proposed Fuel Depot is a “disaster waiting to happen”. *If the Planning Application is approved, the Wokingham Planning Committee will carry a huge part of the responsibility when this does happen.*

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

G.D. Rees (Dr).