

MEMORANDUM

From:	Catherine Brimble Senior Landscape Officer		
Service	WBC Landscape and Trees	App No:	252782
Address:	Former Prince Bros / Grove Service Station, Old Bath Road, Charvil, Twyford, RG10 9QJ.		
Proposal:	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.		
Type of Development:	Minor General industrial/storage/warehouse (1-999 sqm)		
Site Visit Made:	Yes/No		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☐ Request further information before determination as **stated below**
- ☒ Objection due to the reason(s) **stated below**

Comments On Proposal

This application follows an earlier application (250959) which was withdrawn. Our Landscape Consultant, Stuart Ryder previously made comments on the earlier application a number of which are still relevant to this application and will be reiterated within these comments.

Additional documents and information were requested in response to the earlier application in order to fully assess the proposals. Although some additional information has now been provided; I still have a number of concerns regarding the supporting information submitted with this application and comment as follows:

Landscape Appraisal (LA) produced by DEP

1. This document still is not dated so it is not clear when it was produced or when revisions were made, if any.
2. Although the site layout has been amended slightly through this new application (i.e. changes to the retaining wall on southern boundary), this has

- not been assessed as part of the LA document as it remains almost identical to that submitted under application 250959.
3. Stuart Ryder (SR) requested that as the site and the surrounding landscape is within the River Loddon Valued Landscape (as set out in Wokingham BC's Valued Landscapes Assessment – September 2024 (VLA)) further assessment will be required. We will need to understand how the proposed changes to the site conserve and enhance the River Loddon Valued Landscape. This will need to be discussed and demonstrated by the proposals, with the inclusion of the River Loddon Valued Landscape as a sixth landscape receptor in the Landscape Appraisal so the effects of the proposals can be explained.
 4. WBC was not approached to agree the representative viewpoints as is generally good practice. I agree with SR's previous comment that had we been approached, an additional viewpoint would have requested taken from Old Bath Road looking into the Site to be included as a primary location where visual change may be experienced from.
 5. The landscape and visual effects of the proposed floodlighting have not been considered as part of the LV, either as additional structures or how the lighting itself will affect the night-time landscape. Although operating hours are given in the Planning Statement it appears there could be later tanker arrivals outside these hours. This could lead to the flood lighting being on for many hours after official operating times, impacting the sensitive countryside corridor between the settlements of Charvil and Twyford.
 6. The Landscape Framework Plan in the LA (Figure 11) indicates an approximately 2m wide landscape buffer mainly on the southern site boundary. This has not been updated following the repositioning of the boundary retaining wall inside the site boundary as shown on the Proposed Site Plan (5104-24_60). This reduces the landscape buffer to a strip approximately 1m wide for over half of the length of the southern boundary. Although a Planting Plan (5726-01 B) has now been provided with the application, neither the space available for strategic boundary planting nor the planting proposed and its effectiveness is discussed in detail in the LV. The LV indicates that landscape mitigation should form an integral part of the development proposals. However, in my opinion this is not the case as the proposed landscape scheme does not address the effects of the proposed development on the southern and eastern boundaries and only occupies the leftover space after the parking bays have been established, so cannot be 'integral' to development proposals.
 7. As previously highlighted by SR, the treatment of the site's southern and eastern boundaries will be key to ensuring that any character change in the adjacent parts of the Charvil Country Park are minimised and the oil tanks and tanker parking are effectively screened from sight as quickly as reasonably possible. The screen has to work effectively throughout the year and not appear artificial in its own right. The ability to provide sufficient winter screening within a planting bed of now 1m width in places is now extremely doubtful. Although the LA indicates the surrounding vegetation will be unaffected by the proposals, I would question that assumption as the retaining wall structure is likely to require some clearance of trees especially where they are growing close to the site boundary (further detailed comments are provided

on this under the tree survey section). Again, this has not been fully assessed by the LA.

8. The NPPF paragraph 187 a) indicates that decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. This is an essential and fundamental issue that the proposals will need to address through the LA and the proposed landscape scheme to ensure the valued landscape is protected and enhanced.

Tree Survey by TAG Arboricultural Consultants

9. Although the document has been updated since the previous application this is a Tree Survey only and not an Arboricultural Impact Assessment (AIA) as requested by the Planning Officer.
10. The tree numbering on the Tree Survey differs to that used on the Proposed Site Plan and Planting Plan. There will need to be consistency across all drawings.
11. The Tree Survey shows the location of the trees in relation to the existing site layout, however in order for us to fully assess the impacts of the proposals on the trees within and adjacent to the site, an AIA is required in accordance with BS5837:2012. This is also picked up in the concluding paragraph (4.9) of the Tree Survey document which states:
When a final layout design is produced, an Arboricultural Impact Assessment (AIA) should be completed to evaluate the direct and indirect effects of the proposed design, and where necessary recommend mitigation. Where such mitigation is required, an Arboricultural Method Statement and Tree Protection Plan should be produced to provide protection measures as per BS5837:2012 recommendations.
12. It is essential that the AIA is provided as part of this application to assess the impacts of the retaining wall construction including foundations, on the trees growing on or outside the boundary of the site in Charvil Country Park. Based on the Site Layout drawing, it looks as if all the trees and scrub along the eastern boundary will need to be removed as well as and several trees and scrub on and adjacent to the southern boundary. Depending on how the wall is constructed other trees may be affected. As all existing trees close to the site boundaries are being relied on to provide the landscape and visual mitigation within the Landscape Assessment, it is therefore essential that we understand how the trees will be affected by the proposed works. Tree removals will lead to further harm to the surrounding landscape especially as the proposed landscape scheme is currently not acceptable in mitigating the proposed changes and intensification of the site.

Levels – Topographical survey / Proposed Site Plan / Typical Retaining Wall Details

13. A Topographical Survey is provided with this application which gives details of the existing ground levels across the site. In order to understand how the proposed retaining wall on the southern, eastern and small part of the western site boundary will relate to the existing levels within and adjacent to the site, a further drawing will need to be provided showing proposed levels with the existing levels, along the boundary and within the site.
14. The Typical Retaining Wall detail gives an indication as to the proposed heights of the top of the retaining wall and height of the tertiary bund within the

site. This shows the retaining wall facing Charvil Country Park being 1.20m high, but the note also says this will vary, but by how much is not indicated. The varying heights will need to be shown on the proposed levels drawing requested above, which will also help our understanding as to the landscape and visual effects of the wall on the adjacent Country Park.

15. The Typical Retaining Wall detail indicates a 2.4m security fence to the site boundary, the implication being that the facing gabions are outside the site boundary which will not be acceptable. This will need to be clarified by the applicant.
16. Two cross-sections are provided but it is not clear where these are specifically taken through the site. It would be helpful to have a number of site-specific sequential cross-sections both N-S and E-W showing the proposed retaining wall and bund wall heights in relation to the existing and proposed levels within the site and outside the site boundary.

In conclusion I cannot support this application due to the lack of supporting information necessary to fully assess the impact of the proposals and its effect on the surrounding landscape character and tree resource within the adjacent Charvil Country Park as discussed above. I therefore consider the development contrary to the NPPF paragraph 187 a) (see point 8), Core Strategy policies CP1 and CP3 and Local Plan Policies CC03 and TB21, details given below.

WBC Policy Compliance

- **Core Strategy policy CP1 – Sustainable Development:** *‘Planning permission will be granted for development proposals that: 1) Maintain or enhance the high quality of the environment.’* I consider the design proposals as submitted will have a detrimental effect on the adjacent well used Charvil Country Park, River Loddon Valued Landscape and Loddon River Valley with Open Water landscape character area.
- **Core Strategy policy CP3 - General Principles for development:** *‘Planning permission will be granted for proposals that: a) Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life;.... c) Have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses.’* I consider the design proposals as submitted will have a detrimental effect on the adjacent well used Charvil Country Park, River Loddon Valued Landscape and Loddon River Valley with Open Water landscape character area.
- **Local Plan Policy CC03 – Green Infrastructure, Trees and Landscaping:** *‘Development proposals should demonstrate how they have considered and achieved the integration of the scheme with any adjoining public open space or countryside, protect and retain existing trees, hedges and other landscape features, and incorporate high quality, ideally, native planting and landscaping as an integral part of the scheme.’* I do not consider there is sufficient information provided to ensure the proposals can integrate into the adjacent countryside to the east and south of the site, or that the scheme will not cause harm to a number of trees close to the site boundary. The proposed landscape scheme is neither high-quality or sufficient to adequately respond

to the valuable landscape attributes or landscape guidelines which are integral to the Loddon River Valley with Open Water landscape character area in which the site is located.

- **Policy TB21 – Landscape Character:** *‘Proposals must demonstrate how they have addressed the requirements of the Council’s Landscape Character Assessment, including the landscape quality; landscape strategy; landscape sensitivity and key issues. Proposals shall retain or enhance the condition, character and features that contribute to the landscape.’* The submitted Landscape Appraisal by DEP has considered existing landscape character information but did not include reference to the Site being within the River Loddon Valued Landscape area (VLA). The fact that the Site is within the VLA does not preclude the development but rather points to the requirement that it should conserve and ideally enhance the site’s relationship with and contribution to the adjacent landscape. The proposed landscape scheme is not sufficient to adequately respond to the valuable landscape attributes or landscape guidelines which are integral to the Loddon River Valley with Open Water landscape character area in which the site is located.

Conditions & Reasons (if required)

N/A

Date:	9 th January 2026	Signed:	C. Brimble
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