



Change of use from service station
to a fuel oil storage and
distribution facility including the
installation of 8no. fuel oil storage
tanks

Planning Statement Inc. Design & Access Statement

April 2025

A Report commissioned by:
Speedy Fuels & Lubricants Ltd

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1 Introduction

- 1.1 This statement has been prepared by S&L Planning Consultants on behalf of Speedy Fuels Ltd (“the applicant”) to support a full planning application for “*Demolition of two existing buildings and a garage and the change of use from service station to a fuel oil storage and distribution facility including the installation of 8no. fuel oil storage tanks, car parking and associated works*” at Grove Service Station, Old Bath Road, Charvil, Reading, RG10 9QJ.
- 1.2 It sets out the context for the development, including a description of the site and surroundings, the proposed works, and a summary of the relevant planning policies at local and national level. The statement assesses the merits of the proposal against the policies in the Wokingham Borough Core Strategy (adopted 2010), Wokingham’s Managing Development Delivery Local Plan (adopted 2014) and the National Planning Policy Framework 2024 (NPPF), and all other material considerations, which demonstrates that the proposed development:
- complies with Policy CP15 (Employment Development) of the Wokingham Core Strategy, which supports the redevelopment and intensification of existing employment sites within development limits, and helps meet local business needs without resulting in a net loss of employment land
 - promotes the effective reuse of previously developed land in accordance with the spatial vision of the Local Plan and NPPF Paragraph 124 and supports the effective use of previously developed or ‘brownfield’ land.
 - the development is in accordance with Core Strategy Policy CP11 (Proposals Outside Development Limits) and Managing Development Delivery Local Plan Policy CC02 (Development Limits).
 - has been designed in accordance with the Wokingham Borough Design Guide SPD in relation to Core Strategy Policy CP3 (General Principles for Development), ensuring that the layout, materials, and scale of development are appropriate for the context and contribute positively to local character.
- 1.3 This Statement confirms that the proposed development is consistent with the relevant policies of the development plan and national policy aimed at supporting economic activity, making effective use of land, and ensuring good design. On this basis, having regard to the development plan and all material considerations, there is a clear case for planning permission to be granted without delay, in accordance with the presumption in favour of sustainable development.

Submission Information

- 1.4 This Planning Statement should be read together with the following list of plans and supporting documents submitted with this application;
- a) Application drawings:
- Ref: 5104-24 (90) Site Location Plan

- Ref: 5104-24 (50) Existing Site Layout
- Ref: 5104-24 (51) Existing Site Elevations 1
- Ref: 5104-24 (52) Existing Site Elevations 2
- Ref: 5104-24 (60) Proposed Site Layout
- Ref: 5104-24 (61) Proposed Sections
- Ref: 5104-24 (62) Proposed Elevations 1
- Ref: 5104-24 (63) Proposed Elevations 2
- Ref: 5104-24 (70) Proposed Drainage layout
- Ref: 5104-24 (80) Proposed External Lighting Layout

b) Application documents:

- Flood Risk Assessment & Drainage Strategy
- Landscape Appraisal
- Preliminary Ecological Appraisal & Biodiversity Net Gain Report
- Biodiversity Net Gain Matrix
- Preliminary Roost Assessment
- Phase 1 and 2 Ground Investigation Report
- Sustainability Statement
- Transport Assessment
- Tree Survey Report & Plan
- Health and Safety Information Document
- Outline Construction Logistics Plan

2 Site and surroundings

- 2.1 The application site comprises the former Grove Service Station, located to the south of Old Bath Road (A3032), Charvil. The site measures approximately 0.49 hectares and consists of 2no. two-storey red brick buildings with steel frames. The front single-storey building was previously occupied by a fitness studio.
- 2.2 The site is accessed from Old Bath Road with the access shared with the adjacent occupiers, TTC Distribution Ltd. The site is set back from Old Bath Road behind a grassed verge comprising several mature trees.
- 2.3 In the wider area, to the north beyond Old Bath Road is open countryside, to the east is the town of Twyford, to the south is the Loddon Nature Reserve with associated lakes and to the west is the village of Charvil.

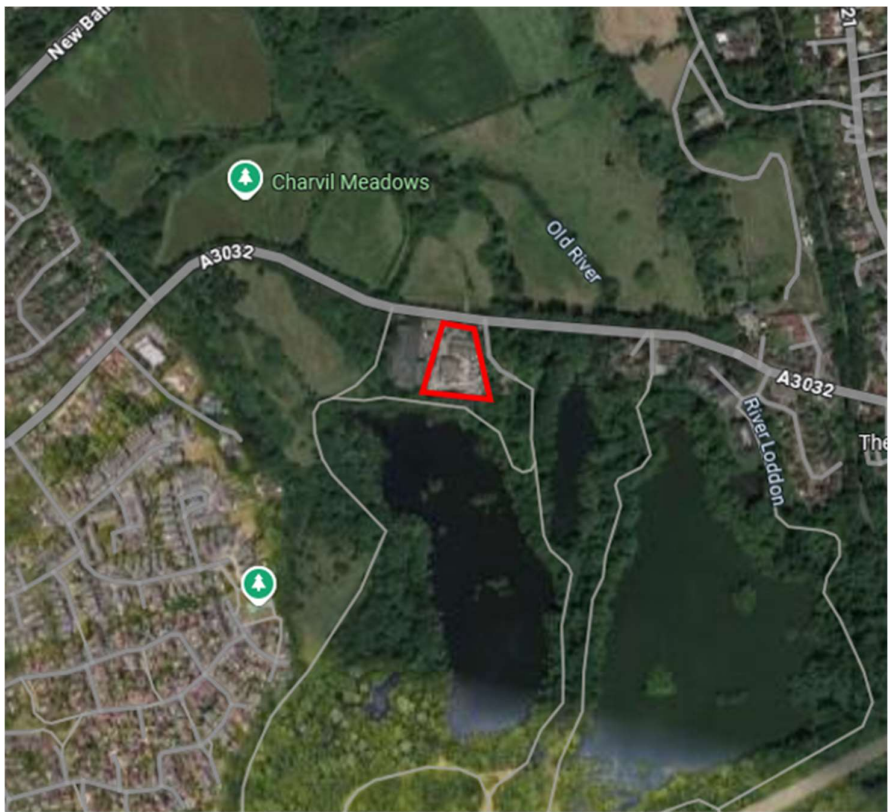


Figure 1 Site location

Source: @Google 2025

Relevant planning history

- 2.4 The following table provides the history of the relevant planning applications on this site.

Application reference	Description of Development	Decision
121328	Submission of details to comply with condition 5 (bicycle parking provision) of F/2012/1130	Approved
121836	Change of use of two offices to gym with changing facilities and alterations (part retrospective)	Approved
121536	Advertisement consent for 1 fascia sign and 1 roadside sign	Approved
111613	Extension of implementation date for planning consent F/2008/1269 (new building for B1 use)	Approved

3 Proposed Development inc. Design and Access Statement

Proposed Development

- 3.1 The proposed development is for the demolition of the existing single-storey building to the rear of the site, the demolition of the single-storey extension to the west of the main building, the demolition of an existing garage and the change of use of the site from a service station to a fuel oil storage and distribution facility. The development also includes the addition of 8no. above ground fuel tanks, the recladding of the remaining building and other associated works as described below.

Design & Access

Amount

- 3.2 The application proposes the demolition of the existing building to the rear consisting of 420sq.m of floorspace along with the demolition of the side extension comprising 18sq.m of floorspace. The development proposes no new floorspace but the slab for the new oil storage tanks will be approximately 460sq.m in area.
- 3.3 In addition, it is proposed to replace the 2850sq.m of existing hardstanding with a more suitable and durable surface for regular use by fuel tankers.
- 3.4 The slab will comprise 8no. oil tanks, and 4no. loading and unloading skids.

Layout and Scale

- 3.5 The existing building located to the rear of the site will be demolished and a slab will be created to house 8no. overground oil storage tanks. To facilitate the inward and outward of vehicles at the same time it is also proposed to demolish the single-storey building attached to the main building located close to the existing access point which will remain.
- 3.6 The oil tanks will be located in the centre of the site. Landscaping is proposed along the southern boundary. The oil tanks will be served by 4.no loading skids, 2no.skids for unloading fuel into the tanks and 2no. skids for the loading of fuel into vehicles for distribution to clients. The tanks will be enclosed by a double galvanised steel armco rail and posts along with additional associated works.
- 3.7 Vehicle parking is situated around the perimeter of the site The proposed parking arrangements include the retention of the 8no. car parking spaces located in front of the main building on site along with 1no. disabled parking space. In addition, there are 3no. dedicated tanker parking bays and 13no. HGV/Rigid parking bays along the southern boundary. On the eastern boundary there are 5no. HGV/Rigid bays and 4 no. van parking bays. Along the western boundary there are 7no. car and van bays including 1no. disabled space. Vehicles will move around the site in a one-way, anti-clockwise direction.

3.8 The existing building at the front of the site will be retained, re-clad and used as offices and workshops in conjunction with the onsite fuelling business. In addition, the following works are also proposed to the main building:

- East Elevation - Existing sliding door replaced with a new roller shutter
- West Elevation
 - Existing door opening to be infilled
 - New roller shutter door added
- South Elevation -
 - Existing door opening to be infilled
 - New roller shutter door added

Appearance

3.9 The proposed development includes the recladding of the main building located to the north of the site. This is shown on the submitted proposed elevation drawings 5104-24 (62) and 5104-24 (63). The applicant is keen to discuss the proposed colouring of the cladding with the local authority to ensure that the cladding does not create any visual impact on the character of the surrounding area.

3.10 The proposed fuel tanks will be coloured British Racing Green and enclosed via a steel double rail galvanised armco rail and posts.

Access

3.11 To facilitate the inward and outward movement of vehicles at the same time it is proposed to demolish the single-storey building attached to the west of the main building ensuring that the site to be accessed and exited by two vehicles at the same time. Vehicles will move around the site in a one-way anti-clockwise direction. Cycle parking will be provided in a separate store located to the west of the main building.

Operation

3.12 The site will be used for the storage and distribution of fuel oil and operated by Speedy Fuels and Lubricants. The site will comprise a fuel tank farm along with the existing building that will be used for administrative purposes along with being used for the maintenance of fleet vehicles.

3.13 The site will be operational during the following times;

- Mon to Friday 5am to 6pm
- Saturday 5am to 2pm
- Sunday 6am to 4pm
- Bank Holidays 6am to 4pm

3.14 It should also be noted that once the site is fully operational there may be times where

potentially 2 or 3 HGV tanker deliveries arrive during week nights outside of the times stated above due to traffic delays or vehicle breakdowns.

- 3.15 The site will be staffed by 4no. part-time employees and 24no. full-time employees.
- 3.16 Any planned maintenance of vehicles / trailers will mostly be carried out during weekdays with only emergency repairs, such as tyre changes being carried out at weekends. The site will have a dedicated garage building where repairs will be undertaken.
- 3.17 With regards to the frequency of vehicle movements, a spreadsheet of the anticipated daily traffic movements including approximate times is included as Appendix 1 of this Statement. In summary it shows the following information:

	Artics (44 tonne) Rigids (12-32 tonne)	Cars / Vans	Total
Monday to Friday	59	73	132
Saturday	12	20	32
Sunday	6	2	8

- 3.18 In terms of the routing of vehicles, the site is located on the A3032 (Old Bath Road). Vehicles accessing/egressing the site will use this road for circa 1.2kms before joining the A4 New Bath Road to travel around the immediate area, or to access the nearby A329(M) (motorway).
- 3.19 In order to ensure their operations, minimise the impact to the environment and local air quality, all Speedy Fuel owned vehicles are equipped with modern Euro 6 engines and fuelled with Hydrotreated Vegetable Oil (HVO).
- 3.20 HVO, a renewable and sustainable fuel, has been shown in studies to significantly reduce harmful tailpipe emissions compared to conventional diesel in a variety of road vehicles.
- 3.21 Key environmental benefits of HVO include:
- **Reduced Air Pollution:** HVO exhibits up to a 30% decrease in particulate matter (PM), up to a 30% reduction in hydrocarbons (HC), upto a 25% reduction in carbon monoxide (CO), and up to 10% reduction in nitrogen oxides (NOx) compared to standard EN590 Road Diesel. This is attributed to its high purity and the absence of aromatic compounds.
 - **Lowered Carbon Footprint:** HVO can achieve up to a 90% reduction in net CO2 emissions, contributing to a more sustainable transportation solution.
 - **Enhanced Environmental Profile:** HVO is non-toxic, odourless, and 100% biodegradable, further minimising its environmental impact.

4 Planning policy

- 4.1 Local planning policy is provided in the Wokingham Borough Core Strategy (adopted January 2010) and the Managing Development Delivery (MDD) Local Plan (adopted February 2014), with supporting guidance in the Wokingham Borough Design Guide SPD (adopted May 2012). Strategic policies and national guidance relevant to the proposal are also set out in the National Planning Policy Framework (NPPF) 2024 and the associated Planning Practice Guidance (PPG).

It should be noted that the new Wokingham Borough Council Local Plan Update 2023-2040 was submitted for examination to the Planning Inspectorate in February 2025 .

Development Plan

- 4.2 The application site lies within the Open Countryside, as defined by the Wokingham Borough Local Plan, and is located between the settlements of Charvil and Twyford.

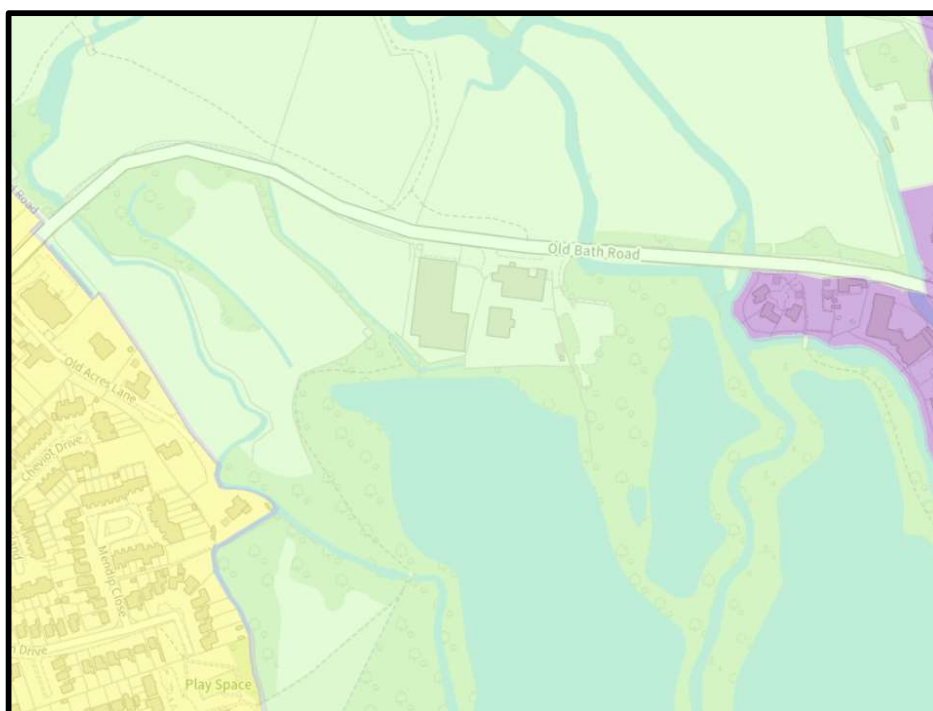


Figure 4 – Local Plan extract

Source: Wokingham Local Plan Policies Map

- 4.3 The following policies of the Wokingham Local Plan and Core Strategy are relevant to this application.

- Policy CP1 – Sustainable Development, this policy ensure that planning permission will be granted for developments that are in accordance with the listed criteria relating to sustainable development. This includes but is not limited to; ensuring the provision of adequate drainage, limiting any adverse effects on water quality and maintaining or enhancing the high quality of the environment.
- Policy CP3 – General Principles for Development, permission will be granted for proposals that are; in an appropriate scale, mass, layout, built form, height and appropriate materials. They provide a functional and safe space, that has no impact until ecological matters, heritage or landscape. It also ensures that the site is used to its full potential.
- Policy CP4 – Infrastructure Requirements, this confirms that planning permission will not be granted unless appropriate arrangements for the improvement or provision of infrastructure, services, community and other facilities required for the development taking account of the cumulative impact of schemes.
- Policy CP6 – Managing Travel Demand, this outlines that permission will only be granted for schemes that provide appropriate vehicular parking, mitigate any adverse effects on local and strategic transport network. Schemes should enhance road safety and no cause highway problems or lead to traffic related problems.
- Policy CP7 – Biodiversity, this ensures that sites designated as of importance will be protected. This includes development which may harm county designated sites, which may harm habitats, or species of principle importance or compromises the implementation of the national regional and local biodiversity action plans.
- Policy CP9 – Scale and location of development proposals, this policy ensures that the scale of development proposals in Wokingham Borough must reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility.
- Policy CP11 – Proposals Outside Development Limits (Including Countryside Areas), this policy seeks to protect the separate identity of settlements and maintain the quality of the environment. Development outside the limits will only be permitted where: It is contained within suitable located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement that does not lead to excessive encroachment or expansion of development away from original buildings.
- Policy CP15 - All proposals for employment development will include mitigation commensurate with the impact of the development on the demand for housing, labour, skills, traffic and highways.
- Policy CC01 – Presumption in Favour of Stainable Development, this confirms that applications that accord with the policies in the Development Plan will be approved without delay unless material considerations indicate otherwise and where there are no policies

relevant to the application or relevant policies are out of date, then the Council will grant permission unless material considerations indicate otherwise.

- Policy CC02 – Development Limits, this highlights the development limits for each settlement as defined on the Policies Map. This site lies outside of the urban area and within designated countryside area.
- Policy CC03 – Green Infrastructure, Trees and Landscaping, this policy ensures that proposals demonstrate how they have considered and achieved the following criteria within scheme proposals, this includes: protecting and retaining existing trees, hedges and other landscape features.
- Policy CC04 – Sustainable Design and Construction, permission will only be granted for proposals that seek to deliver a high-quality sustainable construction, non-residential proposals shall achieve the necessary BREEAM requirements and meet or exceed statutory requirements for water resource management. All development, including conversions, alterations and extensions shall incorporate suitable waste management facilities, including on-site recycling.
- Policy CC06 – Noise, this policy seeks to ensure that proposals must demonstrate how they have addressed noise impacts to protect noise sensitive receptors. Where there is an adverse effect then the development must include physical mitigation and the proposed layout reviewed.
- Policy CC07 – Parking, planning permission will only be granted where the proposal demonstrates that the proposed parking provision meets the standards set out in Appendix 2 of the MDD.
- Policy CC09 – Development and Flood Risk (from all sources), this states that all development in Flood Zones 2 or 3 must consider the vulnerability of the proposed development. Development must be guided to the area of the lowest flood risk by applying the sequential approach taking into account flooding from all sources and shall ensure flood risk is not worsened for the application site and elsewhere. The sequential test will not be required if the scheme is for a conversion and change of use unless it involves a change to a more vulnerable class. Where required and suitable detailed flood risk information in the form of a Flood Risk Assessment (FRA) will be required.
- Policy CC10 – Sustainable Drainage, all development proposals will ensure that the surface water arising from development is considered. This must be demonstrated through a Flood Risk Assessment or through a Surface Water Drainage Strategy. All development proposals must incorporate sustainable drainage systems (SuDS) where practicable which must be of an appropriate design.
- Policy TB21 - Landscape Character, this policy ensures that proposals must demonstrate that they have addressed the requirements of the Council's Landscape Character Assessment, which includes landscape quality, landscape strategy and landscape

sensitivity. Proposals shall retain or enhance the condition, character and features that contribute to the landscape.

- Policy TB23 - Biodiversity and Development, planning permission for development proposals will only be granted where they comply with Policy CP7 and demonstrate that they provide opportunities including design, layout and landscaping to incorporate new biodiversity features or to enhance existing. It also seeks to ensure that appropriate buffer zones are provided between development proposals and designated sites exist.
- Wokingham Borough Design Guide SPD (2012) – This outlines guidance on reaching high-quality design.

National Planning Policy Framework (NPPF)

- 4.4 The NPPF including the presumption in favour of sustainable development, is an important material consideration in the determination of the application. Its relevant parts are summarised below.

Paragraph 7	The purpose of the planning system is to contribute to the achievement of sustainable development.
Paragraph 11	The presumption in favour of sustainable development lies at the heart of the Framework. For decision-taking this means (c) approving development where it accords with an up-to-date development plan, or (d) where there are no relevant development plan policies or where the policies which are most important in determining the application are out-of-date, granting permission unless adverse impacts would significantly and demonstrably outweigh the benefits or Framework policies indicate development should be restricted.
Paragraph 88	This paragraph states that planning decisions should enable the sustainable growth and expansion of all types of businesses in rural areas through the conversion of existing buildings and well-designed new buildings.
Paragraph 115	This states that sustainable transport modes should be prioritised, safe and suitable access to the site should be achieved for all users, and any significant impacts on the transport network or highway safety should be mitigated.
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.
Paragraph 117	Applications of developments should give priority to pedestrian and cycle movements, address the needs of people with disabilities and reduced mobility in relation to transport, create places that are safe, allow the efficient

delivery of goods and access by service vehicles.

- Paragraph 124 This paragraph highlight that decisions should promote an effective use of land in meeting, not only homes, but other uses as well.
- Paragraph 135 Planning decisions should ensure that developments function well and add to the overall quality of the area and not just for the short term but over the lifetime of the development. It ensures that the development is visually attractive because of good design, layout and appropriate landscaping.
- Paragraph 187 Decisions should ensure that they contribute to and enhance the natural and local environment, this is done by minimising impacts on and providing net gains for biodiversity. This includes also preventing new and existing development from contributing to/being put at unacceptable risk from, unacceptable or soil, air, water or noise pollution.
- Paragraph 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 leads 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.

Previously Developed Land NPPF Glossary Definition: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Sustainable Development NPPF Glossary Definition: The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

5 Planning assessment

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 refers to the development plan as a whole. Regard is to be had to the development plan for the purposes of any determination to be made under the Planning Act, the determination must be made in accordance with the plan unless material considerations indicate otherwise. Other material considerations include the NPPF and the PPG which are principal material considerations and should be given substantial weight.
- 5.2 Section 70(2) of the Town and Country Planning Act 1990 requires that regard is to be had for the provision of the development plan, so far as it is material to a planning application, and to any other material considerations.

5.3 The matters set out below are considered the most relevant to the determination of the planning application;

- Principle of development
- Impact on landscape
- Transport, access and parking
- Environmental and technical considerations:
 - a) Drainage and flood risk management
 - b) Biodiversity and ecology
 - c) Trees
 - d) Contamination

5.4 Each of these matters is addressed separately below.

Principle of Development

- 5.5 The application site is located outside of any settlement boundary in the Wokingham Borough Local Plan. As such, the site is designated as being within the Open Countryside as per Policy CP11 (Proposals outside development limits). The policy aims to restrict development in the countryside unless it meets specific exceptions.
- 5.6 The site comprises previously developed land and is currently occupied by commercial garages and associated infrastructure. This proposal is for a change of use to a fuel oil storage and distribution facility.
- 5.7 The application site is an already established employment location, demonstrated by the fact that the previous occupiers of the site were a vehicle repair centre and the adjacent property is occupied by an established distribution facility operated by TTC Distribution Ltd. This area is

suitable for the proposed distribution purposes as it has easy connectivity with the areas major roads such as the A4, A3290, A329(M) and the M4 ensuring traffic can be easily routed away from the major populated areas.

- 5.8 While there is no explicit definition of a “rural enterprise” within planning policy, Paragraph 88 of the NPPF confirms that planning policies and decisions should enable the *“sustainable growth and expansion of all types of businesses in rural areas both through conversion of existing buildings and well-designed new buildings”*. It would therefore be unreasonable to limit the interpretation of ‘rural enterprise’ to not include those existing enterprises which are located and already operate in rural locations such as the application site. As such, the applicant considers that the economic approach of the NPPF would directly conflict with the relevant provision of policy CP11.
- 5.9 The NPPF supports the expansion and increased variety of these types of existing businesses within the countryside and the proposal therefore does not conflict with the first exception under Policy CP11.
- 5.10 Paragraph 89 of the NPPF provides further emphasis on the need to consider sites outside of development limits for suitable employment development, encouraging the use of previously development land and sites that are physically well related to existing settlements where suitable opportunities exist. The NPPF defines previously developed land as *“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.”*
- 5.11 The proposed use is supported by paragraph 89 of the NPPF given the fact that the development would ensure the re-use of previously developed land and is well related to the existing settlements. It is also well connected to major roads ensuring vehicles are not routed through densely populated areas and causing any impact on smaller roads.
- 5.12 The proposals will provide visual enhancements to the site due to the clearance of some of the existing large scale buildings and also the rationalisation and refurbishment of the site including additional landscaping to the southern boundary of the site.
- 5.13 Overall, the proposed development complies with relevant policy CP11 and is supported by the NPPF in principle as there are no unacceptable impacts of the development.
- 5.14 On the basis of the above, the proposal is acceptable in principle and makes appropriate use of previously developed land whilst avoiding harm to the surrounding countryside and provides a positive impact in the re-use a brownfield site as per the NPPF definition. The development is in accordance with Wokingham Core Strategy Policies CP11 and National Planning Policy Framework paragraphs 11, 88 and 124.

Impact on Landscape

- 5.15 A Landscape Appraisal has been submitted as part of the application. Published recognised character appraisals were used in the assessment of the landscape character and included the Wokingham Borough Landscape Character Assessment and Natural England National Character Areas. This information together with a site specific appraisal, was used to assess the landscape quality, value and sensitivity of the development and this was used to determine the landscape effects.
- 5.16 The proposed development will not result in a change to the character of the regional or local landscape; it will remain as a mix of land uses including open water bodies, landfill sites, and restored agricultural fields, nature reserves and country parks and adjacent urban fringe.
- 5.17 Due to the brownfield nature of the development site, the fact that it sits within the curtilage of existing industrial development, and the proposed development will be equal to or lesser in height and extent of built form footprint than existing, it is concluded that the resultant landscape effects of the proposed development on local landscape character will be negligible.
- 5.18 The landscape effects on the site are assessed as slight-moderate, as the sensitivity of the site is low. Land use will remain unchanged and the effects are considered neutral (neither beneficial or detrimental).
- 5.19 Viewpoints and potential receptors were selected from various locations identified through the desktop study and site visit. They have been chosen to provide a representation of the range of receptors that have views towards the site, and to provide a baseline for the visual amenity of the local area. Generally, longer views of the site were screened by the surrounding vegetation and built form.
- 5.20 It is assessed that the only receptors post mitigation, which would experience a slight adverse effect are Viewpoint 1, the footpath which run close to the rear of the site, and Viewpoint 3, located in Charvil Meadows; this is due to the proximity of the receptors to the site and the low-lying, flat, open fields between. It is considered very unlikely that the development will be visible from Viewpoint 3 due to screening by the intervening building. The proposed landscaping will play an important role in ensuring that the development is integrated as effectively as possible. Once established the mitigation measures will help to ensure that the development becomes a more integral part of the surrounding landscape.
- 5.21 The site has little value or quality in landscape and visual terms; its development will not cause any harm to landscape character and visually will not have any significant impacts. Only the closest, most sensitive receptors will be affected by the development and these will not have significant effects. Existing vegetation and proposed landscape mitigation will further reduce the visibility of the development.

- 5.22 On this basis, it has been demonstrated that the proposed development will not cause any harm to landscape character and is therefore in accordance with Local Plan Policy TB21.

Transport, Access and Parking

- 5.23 A Transport Assessment has been submitted as part of the application. The Assessment contains a policy review, a review of the existing conditions, details of the proposed development and a trip generation assessment.
- 5.24 Swept path analysis has been undertaken and confirms that the HGV movements can occur safely within the site. There is also sufficient queuing and turning spaces to avoid congestion on Old Bath Road.
- 5.25 The proposed development includes parking spaces for HGVs and staff, the layout provides: 6 HGV parking bays, 14 rigid vehicle bays, 4 van bays, 7 staff car parking spaces (including 1 accessible space) and 20 secure cycle spaces.
- 5.26 A bus stop is located approximately 150m from the site with services to Wokingham, High Wycombe and Reading. Twyford railway station is 1km from the site. Combined with the secure cycling spaces, this is a sustainable location with multiple ways to access the site through sustainable means.
- 5.27 The report concludes that the development will not result in any unacceptable impact on highway matters. The level of movements generated by this development is relatively low and can be comfortably managed within the existing highway network and with the current site access arrangements.
- 5.28 The Transport Assessment demonstrates that the proposal is in accordance with Policies CP6 and CC07 of the Wokingham Core Strategy and MDD respectively, as well as paragraphs 115-118 of the NPPF. The development can demonstrate safe access, appropriate parking, and ensures no detrimental impact on local road networks.

Environmental and technical considerations

- 5.29 In considering the suitability and sustainability of the application site for proposed development, the following environmental and technical matters have been considered:
- a) Drainage and Flood Risk Management
 - b) Biodiversity and Ecology
 - c) Trees
 - d) Contamination

a) Drainage and Flood Risk Management

- 5.30 A Flood Risk Assessment (FRA) and Drainage Strategy have been undertaken and submitted as part of this application. The EA Flood Map for Planning currently shows the central area of the site is located within Flood Zone 1, and the northern and southern extents are located within Flood Zone 2. There is a small area within the south-easternmost corner located within Flood Zone 3. However, a review of the EA Product 6 data shows the site would be located outside the flood extents between the 5% AEP and 1% AEP plus 20% climate change scenarios. No land raising would be undertaken within the 0.1% AEP flood extents to the north-west of the site.
- 5.31 Surface water generated by the proposed development would be attenuated on site using lined cellular storage, prior to discharging to the river. The cellular storage would be designed to attenuate flows for all rainfall events up to the 1 in 100 year plus 40% climate change storm in line with the latest EA guidance.
- 5.32 The discharge rate from the site would be restricted to the Qbar greenfield rate for all events up to the 1 in 100 year plus 40% climate change storm, which would provide significant betterment compared to the existing scenario.
- 5.33 It is proposed that foul flows would be conveyed by gravity to an onsite packaged sewage treatment plant, and treated effluent would then be discharged to the river to the north-east of the site.
- 5.34 As such, the proposals are fully aligned with the drainage and flood risk principles of the National Planning Policy Framework (NPPF) and Wokingham's Local Plan policies CP4, CC09 and CC10, ensuring that the development will not increase flood risk elsewhere.

b) Biodiversity and Ecology

- 5.35 An Ecological Impact Assessment and Biodiversity Net Gain Assessment has been submitted as part of this application. It identifies that the site is located adjacent to the Twyford Gravel Pits Local Wildlife Sites and Charvil Country Park, both of which feature Habitats of Principal Importance.
- 5.36 In summary, the site has a moderate level of ecological interest. Ecological features of interest within the development footprint includes roosting opportunities for bats. The site is adjacent to Twyford Gravel Pits (Loddon Reserve & Charvil Country Park) and Charvil Country Park West & Charvil Meadows which feature Habitats of Principal Importance. Of relevance is the wet woodland adjacent to the southern boundary of the site. The site and immediate surroundings offer suitable terrestrial habitat for amphibians and reptiles, nesting opportunities for birds,

dispersal and foraging opportunities for badger, hedgehog and bats. Ecological features range from site to county level importance.

- 5.37 Further survey work is required to establish the status of roosting bats and inform mitigation requirements. One dusk emergence survey must be carried out during the bat active season between May and August.
- 5.38 No direct impacts to wildlife designations or habitats of ecological importance are anticipated. Indirect impacts such as pollution or habitat degradation will be avoided via implementation of a Construction Ecological Management Plan (CEMP). Potential impacts to protected and/or notable species will be effectively avoided or sufficiently minimised by implementation of Reasonable Avoidance Measurements.
- 5.39 One further bat emergence survey will be completed during the appropriate survey season to confirm details around buildings scheduled for demolition. This has been booked for May 30th 2025.
- 5.40 With regards to Biodiversity Net Gain, the baseline biodiversity value within the red line development is 5.08 habitat units. No hedgerow units or watercourse units are present. Post development, the biodiversity value of the site is 5.08 habitat units.
- 5.41 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. Therefore, the proposal is considered to fall under the 'De Minimis Exemption' and should be exempt from BNG rules.
- 5.42 Taking the above into account the proposals align paragraphs 187 and 193 of the NPPF (2024) and meets the requirements of Local Plan Policy CP1 relating to sustainable development CP7 and Policy CP3.

c) Trees

- 5.43 A Tree Survey and Plan has been submitted as part of the application. A total of 33 trees and one group were recorded within the site.
- 5.44 None of the trees on site are 'A' category. 8 trees included in the survey are 'B' category. 'B' category trees are those with moderate individual quality, or are growing as groups with collective landscape value, such that they attract a higher collective rating than they might as individuals. There are 23 individual trees and one group of trees on the site which are 'C' category. These are 'C' category either due to their low inherent value due to low overall physiological vigour, or structural faults, or their diameter is less than 150mm at 1.5m above ground level.

5.45 The report confirms that given the location of the trees at the site on or near the boundaries, there is scope for development of the site without causing adverse impact on retained trees. There is scope to develop within the RPAs of trees where there are existing buildings and hard surface.

5.46 The proposed development is therefore in accordance with the MDD Local Plan Policy CC03.

d) Contamination and Land Quality

5.47 A Phase I and II Geo-Environmental Investigation Report has been submitted as part of the planning application.

5.48 The Phase I element of the report indicates that in terms of ground gas, there is a low risk from ground gas ingress and explosion. It also confirms that the overall environmental risk classification for the site is considered to be moderate and it recommends:

- complete soil contamination testing of overlying soils to determine the presence or absence of contaminants. Additionally, pH, sulphate and sulphur testing should be completed to enable design of buried concrete.
- complete water contamination testing to determine the presence or absence of contaminants within groundwater beneath the site.
- complete ground gas monitoring to determine risks present due to the surrounding infilled land (Made Ground, tanks, adjacent land use).

5.49 The Phase II element of the report provides the results of the soil and water contamination tests and also the ground gas monitoring that was recommended.

5.50 In terms of soil, the report confirms contamination found within overlying Made Ground strata and natural clay close to above ground storage tank. Anecdotally considered to be typical of urban brownfield sites. The Polycyclic Aromatic Hydrocarbons often a product of ashy deposits and elevated levels of Total Petroleum Hydrocarbons considered to be a result of spillage/leakage from a nearby above ground storage tank and vehicle maintenance.

5.51 On groundwater contamination, local heavy metals and Total Petroleum Hydrocarbons contamination within groundwater (WS7), considered to be a result of spillage/leakage from a nearby above ground storage tank and possibly present at WS8 also. On Ground gases/vapours concentrations of carbon dioxide and methane recorded at acceptable concentrations which fall within Characteristic Situation 1 (CS1). Continue monitoring and in the interim make allowance basic gas protection to CS2.

- 5.52 In terms of risk the report confirms that concentrations of soil determinants are unlikely to present a short-term exposure risk to adult construction workers, specifically from the dermal contact, ingestion and inhalation pathways.
- 5.53 The overlying Made Ground has recorded local Total Petroleum Hydrocarbons and Polycyclic Aromatic Hydrocarbons contamination which on the assumption the site shall be re-developed into a commercial/light industrial premises the exposure linkage to end users is expected to be broken by the construction of hardstanding. However, should small areas of soft landscaped borders be proposed a cover system shall be necessary.
- 5.54 It is not considered that soils present a risk to groundwater/controlled waters on the basis that Made Ground and alluvial clays act as a migration barrier between the source and the underlying aquifer. Currently it is considered groundwater movement is towards the south and the lake where groundwater and surface water chemistry is acceptable.
- 5.55 Taking the above into account the proposed development is in accordance with Policy CP1 of the Core Strategy.

6 Conclusion

- 6.1 This Planning Statement has been prepared by S&L Planning Consultants on behalf of Speedy Fuels & Lubricants Ltd (“the applicant”) in support of its full planning application for the *‘Demolition of two existing buildings and a garage and the change of use from service station to a fuel oil storage and distribution facility including the installation of 8no. fuel oil storage tanks, car parking and associated works’* at Grove Service Station, Old Bath Road, Charvil, Reading, RG10 9QJ.
- 6.2 The proposed scheme would result in the redevelopment of an existing commercial site located in the open countryside. The proposed redevelopment is appropriate to the location and fully supported by local planning policy and the NPPF in relation to economic growth.
- 6.3 The proposal is acceptable in principle and makes appropriate use of previously developed land whilst avoiding harm to the surrounding countryside. The development is in accordance with Wokingham Core Strategy Policies CP11 and National Planning Policy Framework paragraphs 11, 88 and 124.
- 6.4 A comprehensive analysis of the landscape impact of the proposed development has been undertaken and it has been demonstrated that the proposed development will not cause any harm to landscape character and is therefore in accordance with Local Plan Policy TB21.
- 6.5 Environmental and technical matters including flood risk management, biodiversity and ecology, trees and contaminated land have been thoroughly investigated, and the accompanying surveys and reports demonstrate that there are no valid technical reasons to preclude development of the application site.
- 6.6 The application is in full accordance with the relevant policies of the Wokingham Borough Local Plan, Wokingham Borough Core Strategy, and Managing Development Delivery Local Plan. Consequently, and having regard to all relevant material considerations, there is a compelling case for planning permission to be granted without delay, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the presumption in favour of sustainable development at paragraph 11(c) of the Framework.

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