

PLANNING REF : 252782  
PROPERTY ADDRESS : 39 East Park Farm Drive  
: 39 East Park Fa, Charvil  
: RG10 9UG  
SUBMITTED BY : Mr Nathan Hogg  
DATE SUBMITTED : 01/12/2025

COMMENTS:

FORMAL OBJECTION: CATASTROPHIC RISK AND HIGHWAY DANGER

Planning Application Reference: 252782 Site: Grove Service Station / Former Prince Bros Site, Old Bath Road, Charvil Grounds of  
Objection: Extreme Public Safety Risk, Hazardous Substance Consent Failure, and Unmitigable Highway Danger.

I. CATASTROPHIC RISK POSED BY 800,000 LITRES OF FUEL

The proposed storage of 800,000 litres of fuel on this site, which is in a flood-prone area and backs onto a sensitive Nature Reserve, is not merely a planning issue but a major public safety hazard. This volume of storage triggers a new level of legal and regulatory scrutiny.

The application is legally unsound if it has not explicitly applied for or addressed the requirements of Hazardous Substance Consent (HSC), which is triggered by this volume of highly flammable material and mandates a stringent risk assessment concerning the off-site impact of a major accident.

The co-location of 800,000 litres of pollutant liquid within a designated flood-risk area presents an unmitigable, catastrophic risk. A major flood event would risk tank failure, leading to the release of this massive quantity of fuel into the floodwaters. This is not only a breach of the Water Resources Act 1991 due to water pollution but also creates an extreme fire and explosion risk across a wide area, severely jeopardizing public safety and emergency responder operations.

Furthermore, the release of this volume of fuel would result in the permanent, irreversible destruction of the adjacent Nature Reserve. The Council has a statutory duty to protect this designated habitat under the Environment Act 2021, a duty that would be irreconcilably breached by approving this catastrophic risk.

II. UNACCEPTABLE HIGHWAY DANGER FROM FUEL TANKERS

The volume of fuel storage directly correlates to a high frequency of large fuel tanker movements, amplifying the highway danger.

Storing 800,000 litres requires continuous re-supply via large tankers, significantly increasing the frequency of large, slow, and in herently dangerous vehicles entering and exiting the site on the busy Old Bath Road.

The access must safely accommodate the largest possible tanker. It is almost certain that the required Swept Path Analysis for a vehicle of that size (e.g., an articulated tanker) will demonstrate that safe turning movements cannot be achieved without encroaching upon the carriageway, leading to severe collision risk

and a breach of the Highways Act 1980.

An accident involving a fully or partially loaded fuel tanker at the Old Bath Road access point poses a risk far beyond a standard vehicle collision, creating a significant emergency situation due to the risk of ignition and explosion.

### III. VULNERABLE ROAD USER CONFLICT (Schools and Station Commuters)

The increased frequency of HGV and tanker movements creates an intolerable risk for pedestrians and cyclists.

Old Bath Road is a vital route for vulnerable users commuting to local schools and the train station. Approving a development that introduces high-frequency, large-capacity fuel tankers directly contradicts Wokingham's sustainable transport policies and poses an existential safety threat to children and commuters.

The application must demonstrate that it provides physically segregated, protected infrastructure (cycle lanes, protected crossings) to fully shield vulnerable users from the turning movements of the large fuel tankers. Simple advisory warnings or painted lines are wholly inadequate given the volume and nature of the risk (800,000 litres of fuel).

### FINAL DEMAND FOR REFUSAL

We formally request the IMMEDIATE REFUSAL of Planning Application 252782. The application is fatally flawed due to:

**Catastrophic Risk:** The unmitigated and uninsurable risk of storing 800,000 litres of fuel in a flood zone adjacent to a Nature Reserve, breaching major UK environmental and safety regulations.

**Statutory Omission:** Failure to demonstrate compliance with Hazardous Substance Consent requirements or provide sufficient, independently verified Flood Risk Assessment data that models this immense volume of pollutant.

**Highway Danger:** Creating an unacceptable and unmitigable risk to the public and vulnerable road users due to the high frequency of large fuel tanker movements at an unsafe access point.