

**Charvil Parish Council's Response to Application Number 252782,**

**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 at Former Prince Bros / Grove Service Station Old Bath Road Charvil**

Charvil Parish Council would like to comment on this application as follows:

1. The Parish Council accepts this is a brownfield site in the Countryside, and that the business practices of the previous occupants have left the site contaminated in places, and that they had deliberately raised the ground levels so that the main part of the site does not flood, hence it being assessed as flood zone one with areas of flood zone two and three. It is also clear that the lake to the south suffered some levels of contamination due to the pollution from oil tanks etc stored on the site from the reports provided, so significant cleaning up of the site is necessary. While this application attempts to address this issue, it is far from certain that all rainwater/pollutants can be channelled where desired at all stages of construction, or that the efforts to hermetically seal the site will work over time, as wear and tear occurs.
2. The made ground is also of great concern when looking at the change of use. The site has been artificially enhanced to be zone one, and there are signs of subsidence in areas. Given that the previous use was largely the servicing and repair of domestic vehicles and vans, and the proposal is to store oil and HGVs (both substantially heavier than anything from the previous use), the Council is gravely concerned that the issues related to the made ground have not been adequately addressed, even in this updated plan for the site. Any failure of the new surfaces would inevitably increase the risks of catastrophic environmental damage. This would be contrary to CP1, CP3, and CP7 as well as contrary to NPPF Paragraphs 88 and 193.
3. The impact on the environment. Over and above the risks outlined above, the Council has serious concerns about the proposed use of the site in terms of possible future environmental damage from the oil storage and distribution processes. While much is made of the safety of the tanks, the water attenuation scheme and its filtering processes, odour limiting equipment, and sewage processing, all the above will rely on careful ongoing maintenance to ensure the protection of the wider area from water borne and air pollution. In a less sensitive site, any failure of the maintenance regime would lead to some annoyance and low-level pollution that could be cleared up easily, with limited damage. This site is in a particularly sensitive area, being close to the River Loddon, the Loddon Nature Reserve, Charvil Country Park, and Charvil Meadows, all of which have local and regional importance in terms of wildlife and biodiversity. If the water attenuation system or the filtering processes were to fail, then the polluted runoff would very easily make it into the River Loddon, and from there, into the wider Thames area, adversely affecting flora and fauna in a wide area. The vast oil tanks themselves will be situated above ground, and will at times need to be cleaned out – if this process were to malfunction, then again, there would be pollutants potentially running straight into the wider environment; the 35 cm bund around the site is unlikely to wholly contain these if the process needs to be carried out in wet weather. Then there is the general risk of oil spillage when loading and unloading fuel, and in an area with little air pollution, fuel odours would be particularly harmful to wildlife,

as well as unpleasant for the users of the country park, the anglers etc. The sewage solution is also heavily reliant on good maintenance, with any overspill again likely to impact negatively on the waterways. Given that there will be many more staff than previously, and they will be on site for far longer, this is a genuine concern. Finally, there is the issue of light pollution; the Council takes on board the use of technology to reduce light pollution but again, in an area that had little usage in the hours of darkness before, the possible operation for twenty hours a day at times, will change the amount of light emanating into the country park, adversely affecting the wildlife. There are just too many aspects of this operation that will inevitably have negative effects, and the consequences of human and equipment failure are enormous and far-reaching in this sensitive location. This would also be contrary to CP1, CP3, and CP7 as well as contrary to NPPF Paragraphs 88 and 193. This is also contrary to Charvil's emerging Neighbourhood Plan, Charvil 7 regarding the protection of green corridors, and Charvil 8, the protection of the valued green spaces.

Picture of unauthorised use of site from December 2024



4. Risk of Fire. The applicant is careful to argue that the risk of fire is minimal, which the Parish Council accepts. There is a small the risk of such an event, however, and the consequences could be devastating with large quantities of combustible fuel on the site. The Parish Council has asked the fire service as to how long it would take to get suitable equipment to this site but so far there has been no response. The two closest fire stations are Earley and Caversham, so response times will not be very quick if during a busy time of day. Again, the consequences in such an area could be catastrophic, being relatively close to homes, trees, grassland etc.
5. Hours of operation. The previous hours of operation from this site were Monday to Friday 9am to 5.30pm. The proposal is to run from 5am to 6pm ordinarily, but with some vehicle

movements happening up to 2am. The operation will also be seven days a week, with reduced operating hours at the weekend and at Bank Holidays. Consequently, many more people will be affected by this site in their leisure time; so, there will be more noise and disruption at weekends when using the country park, fishing and walking on the neighbouring paths, adversely affecting the quality of life of many who like to enjoy the peace and quiet of the area. This would be contrary to CP3, and NPPF paragraph 185, in that this will impact negatively on the residents' enjoyment of the countryside.

6. **Highways matters.** The previous use of the site did generate many vehicle movements, and this application makes much of the fact that there will be fewer movements than there were previously. This is only half the story. As a car servicing, repair and MOT centre, many of the vehicles accessing the site would have been local, coming from both the Twyford and Charvil directions, with vehicle owners often walking home while their vehicle was seen to. Moreover, these vehicle movements were limited to the main working hours on Mondays to Fridays. This would not have impacted heavily on pedestrian or cycle usage at those times of day. This proposal will mean that the vehicle movements will largely access the site from the A4, through the main part of Charvil (in some cases twice, if they turn right onto the A4 toward Maidenhead). These vehicles will generally be HGVs and will be travelling at various times of day from early morning onwards. There will inevitably be an impact on cyclists - who will not enjoy sharing the narrow A3032 with large lorries on the bends between Charvil and Twyford - and on pedestrians who are already concerned about the state of the narrow pavement joining the two villages. The net result is likely to be a drop in active travel between the two villages and increasing car usage. This seems in direct contravention of CP6 and NPPF paragraph 115, as well as to the emerging Charvil Neighbourhood Plan Charvil 11. A further issue is that contrary to NPPF Paragraph 116, the visibility from the east is compromised by poor sightlines when joining the A3032. Although the swept path analysis implies that the vehicles will not need to cross into the opposite carriageway, the Council believes this to be unrealistic, and visibility from the west is also poor. There are grave concerns that this could become an accident hotspot, especially as there are frequent deliveries at the neighbouring site from HGVs who wait on the main carriageway, affecting visibility further.

The Parish Council would also like to draw attention to the inaccuracies in the Transport Assessment document; Polehampton School is in Twyford, and if the drivers obey the restrictions on entering Twyford, should not be impacted by HGVs from the site at all; it is the A4, not A3; in the vehicle movement section, there are many more arrivals than departures each day, and on some days, there are no car movements but there are lorry movements – unless the drivers walk or cycle (possible but unlikely), or they are sleeping onsite, this must be incorrect. Given this is the case, it is hard to believe any of it.

Picture of shared entrance for proposed Speedy Fuels site and Total Tyres, January 2025



7. Finally, in the pre-application advice offered by Wokingham Borough Council, there is a long list of relevant planning policies that the applicant should consider, and one is notable for the omission of any discussion, and that is CP4, Infrastructure requirements. The applicant has been requested to ensure all the trucks turn left from the site, to avoid the weak bridges to the east, as well as the heavily polluted Twyford crossroads. This means that all these trucks will be heading west into Charvil, along the narrow A3032, and then through the village, and out to the A4. The result is that they need to traverse the zebra crossing and the mini roundabout to Park Lane, both of which are regarded locally as dangerous. The Parish Council believes that if the Borough are minded to allow this application, then there should be some requirement to pay for the crossing to be upgraded to a controlled crossing, and to pay for improvements to the roundabout. Moreover, there need to be restrictions preventing the Speedy Fuels vehicles accessing either Park Lane or Park View Drive South, both of which are rat runs for cars. Despite the width restrictions on Waingels Road, other fuel tankers have been seen driving over the restriction bells.
8. The Parish Council accepts the site has been, and could continue as a site for light industry, but that future use should be mindful of the sensitive nature of the surrounding area, and that this proposal is the wrong business in the wrong place and has no sympathy with the wider communities of Charvil and Twyford, and as such, should be refused.