

# MEMORANDUM

<b>From:</b>	Finlay Rothery Green Infrastructure Support Officer		
<b>Service</b>	WBC Infrastructure	Green	<b>App No:</b> 252782
<b>Address:</b>	Former Prince Bros / Grove Service Station, Old Bath Road, Charvil, Twyford, RG10 9QJ.		
<b>Proposal:</b>	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.		
<b>Type of Development:</b>	Minor General industrial/storage/warehouse (1-999 sqm)		
<b>Site Visit Made:</b>	Yes (25/11/25)		

## 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

I have reviewed the documents supplied by the applicant, with particular attention to the Design & Access Statement Rev A; Proposed Site Plan; Planting Plan; Flood Risk Assessment and Drainage Strategy; Ecological Impact Assessment; Landscape Appraisal; Proposed Drainage - Outfall Section / Details; Proposed Drainage Layout; CEMP; Proposed Elevation drawings; Retaining Wall Detail drawing; and the Paladin Fence Detail drawing.

I have assessed how the proposal interacts with the surrounding green infrastructure with reference to Council core policies.

As stated in document Planning Statement Inc. Design & Access Statement Rev A supplied by the applicant, "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.”

The application documents recognise the high quality of the surrounding green spaces due to their ecological value. It is of vital importance to retain the rural characteristics, the high nature value and positive visitor experience of the residents who use the greenspaces for exercise, education and mental health benefits.

In light of this, I have significant concerns regarding the implications of this development on the surrounding green infrastructure.

#### Contamination/spill risk

I have the following concerns regarding the risk of contamination/spillage into the wider environment:

1. The site sits on “made ground”, meaning there is an inherent risk of instability, which could feasibly lead to cracks and leakage in the bunding.
2. There is part of the application site that sits within flood zones 2 and 3. Given the frequency of flooding in the wider area, the impacts of any fuel spillage incidents at times of flooding would be greatly exacerbated.
3. The surface water is proposed to be dealt with using an interceptor, designed to shut off when overwhelmed in times of flooding or mass spillages. Given that this interceptor discharges water directly into the River Loddon, in the case of filtration system failure or poor maintenance (even if risk is low) it could lead to a massive pollution event of both the river and surrounding connected water bodies within the greenspaces.

As detailed in the Ecological report submitted by the applicant, within the impact risk zone of the site is a SSSI, and a Biodiversity Opportunity area, and habitats which are of both county and national importance. Further, the site is surrounded by well-connected waterways which flood regularly (see photo below – application site is centre of the image), meaning any contamination events would not remain localised and could adversely affect greenspaces further afield.



While the mitigation in place for these scenarios may meet EA guidelines and council drainage policy, and the design might be acceptable for a site in a less ecologically sensitive area, the high sensitivity of the surrounding greenspace, with its water bodies and wetland habitats, means that any failure or unexpectedly severe flooding events could have disastrous and irreparable impacts on these greenspaces and the wildlife within. It is my opinion that the proposed mitigations do not remove the risk to the surrounding greenspace to a sufficient degree when compared to the potential for loss of large amounts high quality greenspace should mitigations fail.

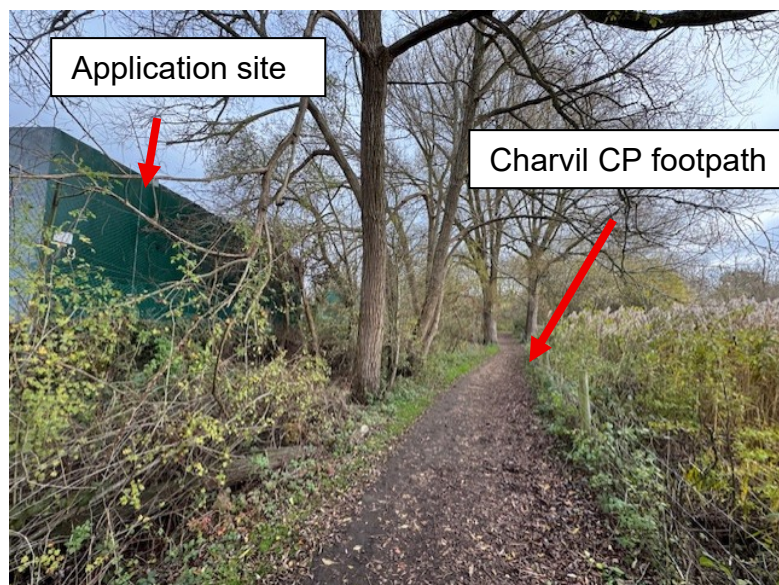
#### Visitor Experience within Charvil Country Park

I have several concerns about the impact the development would have on visitors to the neighbouring country park. The lakeside path passes extremely close to the application site. The proposed mitigation (hedgerow planting, paladin fencing and gabion baskets) does not sufficiently mitigate issues such as:

1. Odours from both vehicles and fuel storage.
2. Air pollution/fumes from both vehicles and fuel storage.
3. Noise from moving and idling vehicles and pump operations from within application site.
4. Increased traffic on road, affecting safety of crossing between greenspace sites and increasing road noise within greenspaces.
5. Light pollution from the lit forecourt.
6. Visual impact (elaborated further below).

Planning Statement Inc. Design & Access Statement Rev A supplied by the applicant states: "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."

I disagree that the closest, most sensitive receptors (i.e. the lakeside path to the south of the application site) will not experience any significant visual impacts. Photo below (taken 25/11/25) shows the proximity of the application site to the footpath and lake (vegetation on right of photo is reedbed within lake boundary).



The proposed paladin fencing and gabion baskets (which would appear to be sited outside of the site boundary, thus encroaching on the country park), provide a harsh and unnatural visual barrier. The proposed hedgerow planting inside the fence will do little to mitigate the visual intrusion of the large vehicles using the 15 parking bays along the entire southern fence line. This would have a significantly urbanising effect, detracting from the natural surroundings of the green space and lowering its quality. As such, I do not believe this application satisfies Wokingham Borough Council Local Plan Policy TB21.

The combination of this negative visual impact with the likely noise, light and air pollution (including odours) produced by the fuel storage site, results in a significantly negative impact, particularly on Charvil Country Park.

#### Road Safety

The application site is nestled between Charvil Country Park and BBOWT Loddon Reserve to the south, and Charvil Meadows on the northern side of the Old Bath Road. These sites are all closely linked and together provide a suite of green spaces, each with its own character. To travel between the sites on the south and north sides of the road, visitors must cross the Old Bath Road.

The expected increase in traffic along this stretch of the road as a result of the proposal in this application, both large tankers and smaller vans, would make crossing the road between greenspaces significantly more challenging and dangerous. According to Council Policy CC03, access and linkages between greenspaces should only be improved, and this application produces the opposite effect, which contravenes policy.

#### Conclusion

For the reasons detailed above, I object to the application. The proposal does not align with Local Plan Policy TB21 "Landscape Character" or CC03 "Green Infrastructure, Trees and Landscaping", specifically on the following points:

"Policy TB21 - Proposals shall retain or enhance the condition, character and features that contribute to the landscape."

“Policy CC03 - Development proposals should demonstrate how they have considered and achieved the following criteria within scheme proposals:

- Promote accessibility, linkages and permeability between and within existing green corridors including public rights of way such as footpaths, cycleways and bridleways.
- Promote the integration of the scheme with any adjoining public open space or countryside.
- Protect and retain existing trees, hedges and **other landscape features.**”

#### **Conditions & Reasons (if required)**

Please use this section to detail any conditions that are required to make this development acceptable in planning terms. All conditions should be accompanied by reasons.

<b>Date:</b>	02/12/25	<b>Signed:</b>	F. Rothery
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