

Response to 250517 - Land off Basingstoke Road



**WOKINGHAM
BOROUGH COUNCIL**

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1. Background

- 1.1 This is a major development proposed within the Detailed Emergency Planning Zone (DEPZ) for the Atomic Weapons Establishment (AWE) site at Burghfield.
- 1.2 It entitles additional 430 dwellings, 80 bed care home, a school and 1 hectare of commercial development, local centre (retail) and leisure, so will be a significant increase in people living, working, shopping and/or visiting in the DEPZ.
- 1.3 Using an average household figure of 2.4 people, there will be an approximate permanent population increase of 1,112 people. This includes the care home residents, but not the school population or the staffing at the care home, school and construction of the site, or those working or using the commercial development, local centre (retail) and leisure.
- 1.4 This is the third iteration of this document, following the first version issued in February 2025, for the pre-application 243014, and second revision during the planning application stage.
- 1.5 The details of this application and versions 1 and 3 of the submitted Development Specific Emergency Plan (DSEP) have been shared with the AWE Off-Site Planning Group (OSGP), and responses from representatives have been used to form the basis of this report. Information and views correct at the timing of writing.

2. Policy

- 2.1 Paragraph 102 of the NPPF states:

“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

a) anticipating and addressing possible malicious threats and other hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security. The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development; and

b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

- 2.2 Policy TB04 (Development in vicinity of Atomic Weapons Establishment (AWE) Burghfield) of the Wokingham Borough Adopted Managing Development Delivery Local Plan (February 2014) states:

1. Development will only be permitted where the applicant demonstrates that the increase in the number of people living, working, shopping and/or visiting the proposal (including at different times of the day) can be safely accommodated having regard to the needs of “Blue light” services and the emergency off-site plan for the Atomic Weapons Establishment site at Burghfield.

2. The applicant will need to provide this information where the proposal exceeds the scale of development detailed below for the consultation zone as defined on the Policies Map.

- 2.3 Similarly, Policy HC10 (Development in the vicinity of Atomic Weapons Establishment (AWE) Burghfield) of the Wokingham Borough Council Draft Local Plan (February 2020) states that:

“Development will only be permitted where it is demonstrated that the increase in the number of people living, working, shopping and/or visiting the proposal (including at different times of the day) can be safely accommodated having regard to the needs of the responding agencies detailed in the West Berkshire Council’s AWE Off-Site Emergency Plan (OSEP) for the Atomic Weapons Establishment”

- 2.4 Therefore, as this proposal results in *one or more additional persons living in the DEPZ*, the applicant is required to demonstrate how the development can be safely accommodated within OSEP - having regard to these policies.

- 2.5 The applicant has submitted a Development Specific Emergency Plan, as part of their evidence to do this, which has been reviewed to form this document.

3. Detailed Emergency Planning Zone (DEPZ) and AWE Off-Site Emergency Plan (AWE OSEP)

- 3.1 The expansion of the DEPZ in 2020, as a result of legislation changes, has resulted in significant challenges to all responding agencies capabilities. There are legal

requirements placed on responsible agencies and the AWE OSEP in ensuring that it can accommodate all those within the DEPZ in relation to their health and welfare. Resources for response and recovery are finite. Any additional population increase would lead to a degradation of these existing capabilities, therefore not only place those in any new development at risk but the existing population in the area.

3.2 The ONR finding's from a multi-agency exercise held in 2023, that the pressures on the OSEP impact on the practical implementation of the OSEP, including the following:

- Arrangements for monitoring for radioactive contamination on or in members of the public as a result of an emergency' (and associated decontamination), known as contamination monitoring.
- Arrangements relating evacuation holding areas for displaced persons awaiting contamination monitoring.
- Arrangements for managing the numbers and scale of displaced people, both those outside the DEPZ and unable to return home for any period of time and those inside the DEPZ who require evacuation; and
- Arrangements for managing those who self-evacuate, especially for ensuring they undergo appropriate contamination monitoring and decontamination.

3.3 This position is consistent with that detailed in the recent appeal decision: APP/H1705/W/23/3326959 (Land at 1-9 Shyshack Lane), where the arguments made by West Berkshire District Council, Basingstoke and Deane Borough Council, and the Office for Nuclear Regulations were upheld by the Planning Inspector:

“Although such an increase would be comparatively small, it is recognised that the plan is not infinitely scaleable. An increase in population would increase the need for, and demand placed upon, emergency responders, reception centres, rest centres and radiation monitoring exacerbating the difficulties of delivery emergency care in a complex multi-agency emergency.”

“...the key purpose of the REPIR to reduce exposure during a radiation emergency through the effective deployment of the OSEP.”

“...the result in incremental development that would over time significantly erode the effective management of the land use planning consultation zones surrounding the AWE to the disbenefit of public safety. The proposed development would place a greater burden on the OSEP, which is already under pressure based on the comments of the ONR [Office for Nuclear Regulation].”

3.4 In the case of Land east of Hayes Drive and north of Church Lane (APP/X0360/W/24/3354607), this appeal was dismissed by the Minister of State for Housing and Planning, on behalf of the Secretary of State (SoS) in September 2025. Substantial weight was applied to the unacceptable risk of harm to the safety and wellbeing of future residents of the proposed development and the wider public. I've summarised the main conclusion from the SoS and Inspector:

1. Unacceptable Risk to Public Safety and Wellbeing

- Although the likelihood of a radiation emergency is very low, the consequences could be significant.
- The Secretary of State agreed with the Inspector that:
 - Even low radiation doses could cause psychological harm and anxiety.

- In an emergency, Blue Light services and public agencies would be under greater strain due to increased population.
- The appellant failed to provide quantitative evidence that emergency services could cope without affecting other duties.
- The proposed monitoring stations did not meet planning condition tests and would not mitigate the risks.

2. Pressure on the Off-Site Emergency Plan (OSEP)

- The OSEP is already under significant pressure due to cumulative development within the DEPZ.
- The appeal scheme, combined with approximately 301 consented but unbuilt units, would unacceptably add to this pressure.
- The Secretary of State gave great weight to the Office for Nuclear Regulation (ONR) witness's professional view that they had no confidence in the adequacy of the OSEP.

3. Threat to National Security and AWE(B) Operations

- AWE(B) is critical to UK defence policy and the delivery of the Continuous at Sea Deterrent (CASD).
- If the ONR were to declare the OSEP inadequate, AWE(B) could be prevented from operating, with serious consequences for national security.
- The Secretary of State agreed that:
 - The proposal would pose an unacceptable risk to the future capability and capacity of AWE(B).
 - This conflict with MDD Policy TB04 and national planning policies (Framework paragraphs 102(b) and 200) carries very substantial weight.

4. Conflict with Local Planning Policy (MDD Policy TB04)

- Policy TB04 requires that development within the DEPZ must demonstrate it can be safely accommodated with regard to emergency services and the OSEP.
- The Secretary of State concluded that this test was not met.
- The proposal would increase the number of people requiring protection in an emergency, without assurance that the OSEP could accommodate them safely.

5. Precedent and Cumulative Impact

- The Secretary of State acknowledged concerns that allowing the appeal could set a precedent for further development in the DEPZ.
- Incremental, unplanned development could erode the effectiveness of emergency planning and public safety.

3.5 There are further recent appeals, all with increases in population smaller than this proposed development that have been refused by Inspectors. For example:

- 25 Heath End Road Appeal (Appeal Ref: APP/H1705/W/24/3345746)
- Benham's Farm Appeal (Appeal Ref: APP/W0340/W/24/3342596)
- Land approximately 150 metres south of Brimpton Lane and west off Blacknest Lane, Brimpton Common (Appeal Ref: APP/W0340/W/24/3346878)
- Recreation Road Appeal, (APP/W0340/W/24/3344580)
- Sunnyside Village Stores Appeal (APP/W0340/W/24/3343072)

These Inspectors' decisions highlighted several concerns, for example public safety and the cumulative and adverse impact developments, including small, can have on the DEPZ & OSEP.

- 3.6 APP/X0360/W/22/3304042 (Land West of Kingfisher Grove) is often referred to as an example of why development should be permitted in the DEPZ, but it should not be. Representations were only made by the Council's Emergency Planning Manager, so the Inspector did not have the objections and detailed arguments from other critical agencies from the Off-Site Planning Group before them – including West Berkshire Council, the Office for Nuclear Regulation and the Atomic Weapons Establishment, alongside the Ministry of Defence.
- 3.7 For example, there was a lack of scrutiny and rebuttal of radiological evidence brought forward– in contrary to what has been provided by the UKHSA, at more recent appeals (please see UKHSA's Advice to West Berkshire Council on radiological impact assessments). Additionally, an inconsistent approach was taken; contrary to other prior appeals where similar evidence was provided by both parties in relation to the DEPZ, and the decision was to uphold the refusal of planning permission. As well, as a different weighting being provided in respect to the importance of the impact of new residential accommodation within the DEPZ.
- 3.8 The Inspector also made clear in their report that "Given its bespoke circumstances, I do not consider that it would result in the creation of a precedent for allowing other development in the DEPZ that in any case must be assessed on its own merit" (para. 21). Therefore, it is clear that this decision does not set a precedent for this appeal, or for any future applications within the Detailed Emergency Planning Zone.
- 3.9 Similarly, APP/W0340/W/22/3312261 'the Hollies' is used. However, the Inspector said the AWE "OSEP is not infinitely scalable and that incremental, unplanned development could, over time, erode the effective management of the land use planning consultation zones and be detrimental to public safety. In that sense, I agree with the Inspectors in the Shyshack Lane appeal, the Benham's Farm appeal and the 132 Recreation Road appeal. However, such concerns do not arise in the present case due to the fact that the appeal site is the only remaining allocated site within the DEPZ. As such, the circumstances of this appeal are unlikely to be repeated elsewhere in the DEPZ."
- 3.10 The Hollies was an allocated site prior to REPIR 19, and expansion of the DEPZ, this site is not.
- 3.11 Concerns have been raised on previous applications and appeals about the supporting Radiological Assessments produced by Katmal Limited, by members of the Off-Site Planning Group. This assessment includes similar inaccuracies and assumptions. UKHSA were commissioned by West Berkshire Council to respond to the common arguments used in radiological and environment impact assessments. This UKHSA report has been attached to this response.
- 3.12 Within the letter and the EIA, the applicant contests the placement of this site within the DEPZ, and whether the DEPZ can be re-drawn. It is worth noting that in the case of Crest Nicholson Operations Ltd & Ors v West Berkshire District Council & Ors (2021), the High Court rejected on all grounds the legal challenge to the determination of the DEPZ. The High Court ruled that West Berkshire Council had followed the legal process outlined in the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPIR19). Additionally, the operator's recommendation (which they use to determine the UPA area) and the Council's determination were lawful and proportionate.

- 3.13 West Berkshire are required under REPIR 2019 to redetermine at least every 3 years, within two months of receiving Consequences Report from AWE. West Berkshire completed this review in January 2023, making two minor changes to the Burghfield DEPZ. Wokingham Borough Council were consulted on these changes as per the legislation. The next review will be completed in line with the legislation, as it has been previously.
- 3.14 Related to this - the applicant has included arguments within the submitted Environmental Impact Assessment regarding the likelihood and severity of a radiation incident impacting this development, but they have been discounted as part of this review. Under REPIR 2019, responding agencies need to ensure there is an adequate response plan in place for the entire DEPZ. We cannot pick and choose. This is detailed within the Approved Code of Practice (ACOP) (paragraph 26): "Emergency plans should be produced with the aim of keeping the radiation exposure of workers and members of the public that might occur in events, as low as reasonably practicable". The DEPZ for Burghfield has been determined and reviewed appropriately as per REPIR 2019 and the associated ACOP.

4. Impacts on the OSEP from the proposed development

- 4.1 This is an already densely populated area within the DEPZ, with Spencers Wood and Three Mile Cross to the north of this development. These areas already contain large populations, busy roads, large numbers of commercial units and pre-existing vulnerable sites (e.g. schools, caravan parks and care homes), so the concerns listed in 3.3 are applicable here.
- 4.2 The list below, sourced from responses from the OSPG, as an example of the issues this development would impact upon:
- a. Significant addition of population required to shelter
 - b. Increased number of individuals that may need support from services during sheltering period
 - c. Increase in numbers that may require self- or mass decontamination
 - d. Increase in number that require access to Radiation Monitoring Unit visit
 - e. Increase in number that may require relocating – including immediate short term at assistance centres and longer term re-accommodation
 - f. Increase in number that may require long term health monitoring
- 4.3 In addition to these issues which apply to a general population, the primary school and care home present additional challenges with regards to sheltering.
- 4.4 Whilst sheltering is the protective action for the DEPZ, in a school environment this has many challenges with regards to maintaining welfare of young for up to 48 hours.
- 4.5 A subgroup of the AWE OSPG was established to address issues raised by Educational Establishments about their preparations and required response to a radiation emergency. Concerns that the establishments and response partners have identified include:
- Establishments don't have the resources, or space to store equipment for decontamination

- Staff require training to instruct and oversee self-decontamination process, including undertaking this for those who are unable to self-decontaminate themselves (e.g. age or special needs)
 - Safeguarding issues of requiring children to remove layers of clothing, if no spare clothing available
 - Compliance of older children/young adults to self-decontaminate or remove clothing, if no spare clothing available
 - Establishments don't have the resources, or space to store equipment for sheltering
 - Parents & guardians likely to 'break' sheltering, to retrieve children from school, especially if expected to shelter overnight. This may increase the radiological risk to those young people and to those collecting them if they travel through an affected area during a release or without responders having yet assessed any residual hazard. In addition, to impacting those remaining to shelter.
- 4.6 To reduce the impact of these issues, Educational Establishments may be prioritised for 'controlled relocation', by those leading the response (the Strategic Coordinating Group). Any decision will require a risk assessed approach considering a range of factors and the activation of several multi-agency and single agency plans.
- 4.7 Therefore, an additional school in the DEPZ may exacerbate the issues identified by the ONR, (see paragraph 3.2), if multi-agency response is required.
- 4.8 Welfare of residents in care home presents challenges during sheltering as it is important to maintain staffing, food provision and delivery of medical supplies.
- 4.9 Re-location from a care home is likely to introduce greater risks to welfare of residents than allowing them to remain in an affected area. Again, this will be a decision made for responding agencies – depending on the incident and the individuals within the home. Protection of staff and other contactors will also be taken into consideration. As such it is inadvisable to introduce a new care home setting within a DEPZ, especially where already densely populated.
- 4.10 The report is predominately focussed on the residential development, care home and school, however there will be an impact from the open spaces, parklands, allotments, commercial development, local centre (retail) and leisure facilities proposed. These will similarly draw upon multi-agency resources and exacerbate pressures listed in 4.2, due to the increased visiting, and working population.

5. Review of the submitted Development Specific Emergency Plan

- 5.1 There are key fundamentals in this emergency plan that we are in principle against. This review will focus on these issues, rather than providing detailed feedback on the document. These are:
- Use of a school for emergency response functions
 - No consideration for the additional multi-agency resources required from this development
 - Arrangements for displaced people
 - Burden on the Local Authorities and duplication of response actions
 - Concerns from the Office for Nuclear Regulation as to how this Development Specific Emergency Plan can be regulated within REPP19.

- Role of MC staff

Use of a school for emergency response functions

- 5.2 The applicant in correspondence with the Council has referred to Health Protection Agency dated 2011. The applicant has cherry-picked parts of the guidance to support their arguments, including the Local Authorities need to be involved in the nominations of locations, and that local arrangements can differ from the guidance.
- 5.3 Wokingham Borough Council has taken the decision to not allocate schools as potential RMU locations, when asked to do so as part of the Off-Site Emergency Plan, and the Thames Valley Local Resilience Forum's Radiation Monitoring Unit Framework. This is the case for other local authorities in the region too, including West Berkshire.
- 5.4 The guidance also states that RMUs should be located at or near to a reception centre. However, this site is being offered as a RMU or a reception centre, so if the applicant is following this guidance verbatim, it is not suitable.
- 5.5 We have taken the decision that a school is not a suitable location for a radiation monitoring unit (or as a reception centre either), reasons below.
- 5.6 REPP19 requires that emergency plans must enable prompt protective actions to be taken to reduce radiation exposure to the public. Schools will not be readily available for quick redeployment of a RMU, so they are not compatible with the legislation. They are typically open for 39 weeks of the year, so it is a likely that a school would have to closed to open an RMU. This will cause lengthy disruption to a critical service, which will always be a last resort for a local authority.
- 5.7 In the letter to the Council, the applicant has confusingly said "even if the site were contaminated, the RMU and any rest/reception centre would not be operated on site until the shelter advisory had been lifted". Ignoring the points made elsewhere, if the school site was contaminated, we especially would not be using a school to host a RMU or assistance centre.
- 5.8 The site would need to be thoroughly monitored, cleaned and monitored again, before it be re-open to serve this purpose. If the local area and site was safe, it would be used as a school. As above, the Council will not want to disrupt the operation of a school.
- 5.9 If the site was contaminated whilst it was occupied, the occupants may need to be re-located, which will take significant multi-agency resources are required at all stages of this process to ensure this is operated safely, including transportation, a holding area (outside of the DEPZ), and reuniting with families. This would not be a quick process, so again, it would be contrary to the OSEP.
- 5.10 The applicant has not considered the logistics involved in removing the shelter action, when it comes to school children. There is no guarantee if the school is not sheltering, but other parts of the DEPZ are, that the school could be used an RMU or assistance centre. The local authority and schools have a statutory duty of care to ensure children leave school safely, as part of their broader safeguarding responsibilities. Parents and guardians may still be sheltering at home or work, if the action still applies to the area of the DEPZ they are in. Therefore, the school will not be able to discharge pupils until they have the assurance they will be safe off site.
- 5.11 There is also public perception post incident of sending children into a facility used to monitor radiation, even after it has been thoroughly cleaned.

- 5.12 It is concerning that the applicant has admitted in the letter to the Council, that this development could mean that an RMU would take longer to fulfil its mission. The same logic can therefore be applied for the various impacts that an additional significant population within the DEPZ would have, on the other response capabilities required by responding partners, as highlighted in this document.
- 5.13 RMUs are run by UKHSA, not the NHS as stated by the applicant, but they are staffed by various multi-agency partners, so the requirement to either open additional RMUs, or operate them for longer (due to additional population) has an impact on the efficacy of the plan and response, as well as requirement to have additional staff trained and equipment.
- 5.14 Regardless on the feasibility and effectiveness of this proposal, the school will only built by the LPA when the need arises and it is fully funded. There are no assurances that this will be prior to occupation of the development, so therefore the DSEP will not be live at this time.

Relocation and displacement persons - transport & onward accommodation

- 5.15 There are no robust arrangements proposed to support in the potential relocating residents after the 48 hours, or before if there is inadequate shelter.
- 5.16 It is unrealistic to assume that residents would automatically be allowed to remain or return to their homes post-event. The DSEP states that the MC will put people up in hotels if needed.
- 5.17 How can they guarantee this will be implemented successfully? Hotel rooms are in short supply – and they will be in demand during the incident from displaced individuals outside the DEPZ, not able to reach their home, as well by responding agencies booking for their staff and for incoming mutual aid.
- 5.18 How are individuals getting from their homes to a hotel, if they have been displaced? Will hotels be willing to take individuals who haven't been monitored for radiation? How are the individuals being registered so they can be provided with updates? What needs do these people have? Who will fulfill these needs? What impact will the use of hotels by residents have an availability of rooms for staff required for mutual aid?
- 5.19 Humanitarian response has to be appropriately managed and resourced. This was clearly outlined in the findings following the Grenfell fire. The Inquiry details that many survivors felt abandoned by authorities in the immediate aftermath. There was no coordinated support system in place. The response was described as “Chaotic and disorganised”, which worsened an already traumatic situation. This was severely damaging to survivors, many of whom were left without basic necessities or emotional support. Even 100 days after the fire, over 150 survivors were still living in hotels. Only a handful had been offered permanent housing. This prolonged displacement added to the trauma and uncertainty faced by families.
- 5.20 Therefore, I reject the suggestion within the letter sent to the Council that assistance centres are not required.
- 5.21 An additional population with the DEPZ increases the burden on the plan and responding agencies. The Council has a humanitarian assistance plan, as well the Thames Valley Local Resilience Forum plans. But these are not infinite, and cannot stretch to an increased population in the DEPZ.

- 5.22 This topic on why additional populations cannot be accommodated in existing facilities has been addressed by West Berkshire and Wokingham Borough Councils in other planning applications and appeals, which are in the public domain.
- 5.23 The DSEP also includes an Emergency Refuge room, which residents can drop-in to, but there are no substantial details on this. How are they ensuring that those dropping in are not compromising individuals already sheltering?

Burden on the Local Authorities and duplication of response actions

- 5.24 As identified in the document, the plan and management company (MC) will need close integration with the responsible local authorities' Emergency Planning teams and their respective emergency planning arrangements – to ensure the success of the OnSEP. Whilst this makes sense in practice, it places a new burden on LAs to support. LAs and their Emergency Planning teams are already stretched. There is no capacity to support in the development & regular reviewing of this plan, training & exercising of their staff and the community. Without the support of Wokingham Borough Council and West Berkshire District Council, and other responding agencies in the OSPG – this plan does not work.
- 5.25 We will be unsighted on the training and briefings being delivered to residents, the care home and the school, by individuals and organisations to who are unfamiliar with the OSEP. This could hinder the response where conflicting information is provided.
- 5.26 The Off-Site Emergency Plan, and accompanying plans, have provisions within it to provide warning and informing to the public and identify and support vulnerable residents. The developer duplicating this could hinder response, especially where they deviate from agreed messaging, processes and measures within the Off-Site Emergency Plan.
- 5.27 The plan states it will act as the primary contact for community members. This is inappropriate. Advice will be issued jointly by the responsible partner agencies as part of the response structure. The local authorities will have their call centres staffed to answer questions or concerns from residents, that are not immediate emergencies required for blue light services.

Concerns from the Office for Nuclear Regulation as to how this Development Specific Emergency Plan can be regulated within REPP19.

- 5.28 The Office for Nuclear Regulation have raised concerns to the Council that the DSEP would have no legal basis within REPP19 and there is no guarantee that this plan will be implemented and maintained for the lifetime of development, if planning permission is granted.
- 5.29 The DSEP would sit outside of ONR's regulatory line of sight, so they would not have the required assurances of its initial and, indeed, continuing resilience – as they are able to do with the OSEP.
- 5.30 The ONR will be issuing this formally as part of their response to the planning application.
- 5.31 The above points are an example of why the position is held by the local authorities within the Off-Site Planning Group to not condition end-user or community emergency plans for residential developments in the DEPZ. As, there is no robust assurances can

be provided that plans can be successfully maintained and implemented for the duration of the development, and no legal mechanisms for the ONR if required.

Staffing of the MC

- 5.32 The roles and the actions given to staff may designate them as Emergency Workers under REPIR 2019, and Emergency Reference Levels could therefore apply. I am pleased to see that the latest version of the Plan includes a reference to a Radiation Protection Advisor.
- 5.33 The applicant makes arguments that the MC team would not be considered as emergency workers, because they will not be designated a role within the operator's emergency plan or a local authority's off-site emergency plan. Regardless of this, as a responsible employer under the Health and Safety at Work Act 1974, the Management Company will need to ensure that correct arrangements and protections are before, during and after a radiological incident. They have detailed within the DSEP that they will have staff who will be conducting emergency response within the DEPZ during a radiological incident – I would suggest they follow the same measures which are required for emergency workers.
- 5.34 The DSEP states that they will be requesting its employees to 'break the shelter advisory' potentially when it has not been revoked by multi-agency partners, to undertake welfare checks. The advice from the multi-agency response will be to shelter until safe to do otherwise, this will also apply to businesses like the MC, as well as residents.
- 5.35 The lifting of the shelter protective action will be decided by the Strategic Coordinating Group, in liaison with Recovery Coordinating Group and the Scientific and Technical Advice Cell. This will be a complex decision, based on a range of considerations, data & evidence – that the MC and their RPA is unlikely to be privy too. If any harm comes to the MC employees from not following the advice of the emergency service, this may lead to criminal, legal and/or financial challenge, especially if they do not have the appropriate safeguards in place.
- 5.36 The DSEP states this will happen so the MC staff can undertake welfare checks. It would be surprising for an RPA to go against the advice of the emergency services, and support the decision for the MC staff to break shelter. Therefore, the MC is highly unlikely to be able to achieve this function. There is also no consideration on how to ensure that any contamination is not passed onto residents – in regards to clean and dirty lines.
- 5.37 It is more likely that the MC staff will only be able to provide welfare checks following the lifting of sheltering. If this area has not been impacted and there are no other multi-agency instructions and measures required, residents will be able to return to business as usual. Therefore, residents are unlikely to need individual welfare checks.
- 5.38 If the area has been impacted and interventions are required, such as relocation, attendance at the RMU or mass decontamination – welfare support will be offered at these locations by partners. Any immediate issues will be reported into 999 – which likely, the residents will have done themselves, and so do not require the support of the MC.
- 5.39 Concerns have been raised to the Council the training and qualifications of the MC staff will be appropriately trained.
- 5.40 The applicant has designed two highly specialised roles in RC1 and RC2. However, the training listed is very light-touch and across broad topics. It provides no detail on the

levels of training and qualifications required. For this plan to be successful – RC1 and RC2 have to be suitably qualified. The responsibilities outlined must only be delivered by specialist individuals and organisations. If not, for example, the welfare they will be offering will be limited, and may hinder the response if inappropriate advice is provided to residents.

- 5.41 I find it highly unlikely that they will be able to find permanent members of staff available to do this, alongside the regular day to day MC duties. If the required standard staff cannot be recruited, then this plan is null and void, therefore the development must not be built.
- 5.42 Additionally, the plan states that staff will be managing waste, including contaminated PPE – which the applicant has been previously advised, but this has not been resolved. The Council has been advised by the UKHSA that this waste will be considered as radioactive waste, and therefore a Radioactive Waste Advisor is needed. Cleaning of contaminated surfaces will need to ensure compliance with The Ionising Radiations Regulations 2017 for workers protection. These requirements have not been considered.
- 5.43 The DSEP says that discarded PPE will be left for the LA to deal with. This could be unsafe for our staff and contractors, and is therefore not a suitable arrangement.

Expectations the on school, care home and GP service

- 5.44 Partners have commented that the expectations on the school, care home and GP service are unworkable and unrealistic – as well as being outside the control of the MC to control and enforce.
- 5.45 The applicant has amended the plan to reduce some of these duties from the earlier version. Whilst this is partly positive, as these were unrealistic – it has weakened the DSEP, as less provision is now being provided.

Each of these components will require separate emergency plans and procedures in place before construction can begin on the site.

Radiological monitoring and metrological station

- 5.46 Partners within the Off-Site Planning Group have reservations about the usefulness of this approach – as it would not aid multi-agency decision-making.

These issues were well discussed at the Hayes Drive inquiry. It was established that STAC will not be taking account of the air monitoring data then the site's and the emergency service's response will diverge. This will be a hinderance for clarity of communications provided to communities, which could lead to their harm.

Working and visiting populations

- 5.47 No assessment has been made within the DSEP of the impacts or any mitigations proposed for the commercial development, local centre (retail) and leisure proposals, which are part of this development within the plan.
- 5.48 Therefore, the plan is not sufficient in this regard, as well as the other points made above.

Summary

- 6.1 I have received comprehensive responses from partner agencies within the Off-Site Planning Group – who have raised concerns that this development will add considerable pressure on to the Off-Site Emergency Plan, and that the mitigating DSEP is not sufficient in dispelling these concerns. The overwhelming feedback is that the core principles are flawed – and therefore the DSEP could not be implemented in preparation for, in response to, or in recovery to a radiological incident from AWE Burghfield which impacts this location.
- 6.2 It would be outside of the defined regulatory process for the OSEP, led by the ONR, as laid out in REPPIR 2019. As the DSEP approach is unproven for delivering public safety in the event of a radiological emergency, this is a significant concern. Partners, but the ONR particularly, would not be able to get the assurance that the DSEP and crucially the OSEP, had the necessary preparedness and resilience in place.
- 6.3 Therefore, my response to this application is that this development is within direct conflict with the Council's TB04 policy and Paragraph 102 of the NPPF. Therefore, I strongly advise the Council objects.