

Date: 9 July 2025
Application: 251458



**WOKINGHAM
BOROUGH COUNCIL**

WBC Emergency Planning

Development Management &
Compliance

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Dear WBC Emergency Planning,

Full Planning Approval Consultation

Application Number: 251458

Applicant: Michael Ward

Site Address: Jardine Meadows, Croft Road, Shinfield, RG7 1YP

Parish: Shinfield

Grid Reference: Easting - , Northing -

Type of Development: Minor Dwellings (1-9)

Proposal: Full application for the proposed erection of 2no. detached 4-bedroom dwellings, access and associated landscaping.

Case Officer: Kieran Neumann

Development Management has received the above application and we require your comments on the proposal using the recommended memorandum below. The documents associated with this are available to view in NEC DM using the application number 251458. Alternatively, public documents are available to view on the Council's planning application search page: [Wokingham Borough Council Online Planning](#).

Please index your response into NEC DM against the application. If you are recommending conditions, you should give a reason with reference to relevant policies. A list of standard conditions can be found on the Z Drive at: [Z:\Standard Planning Conditions](#).

Your observations are required in respect of this application within **10 working days** of the above date or **15 working days** if the development type is classed as a major development.

Yours sincerely,
Development Management & Compliance

MEMORANDUM

From:	Harry Williamson Emergency Planning Manager		
Service	WBC Planning	Emergency	App No: 251458
Address:	Jardine Meadows, Croft Road, Shinfield, RG7 1YP.		
Proposal:	Full application for the proposed erection of 2no. detached 4-bedroom dwellings, access and associated landscaping.		
Type of Development:	Minor Dwellings (1-9)		
Site Visit Made:	No		

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

The application site is situated within the Detailed Emergency Planning Zone (DEPZ) surrounding Burghfield Atomic Weapons Establishment (AWE). The proposed development will increase the residential population within the DEPZ.

The DEPZ and Off-Site Emergency Plan is in place to protect individuals living, working and visiting within this boundary, as legislated by REPPiR 2019. Any increase would have a detrimental impact on the Council, and partners' ability to implement the Off-Site Emergency Plan (OSEP). As such, the proposal would be contrary to the requirements of Policy TB04 of the MDD Local Plan and section 8 of the NPPF.

There are existing pressures on the OSEP which mean any increases in the number of individuals living, working and visiting the DEPZ need to adequately mitigation against. Pressures include those identified by the Office for Nuclear Regulation following a multi-agency exercise held in 2023:

- 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.

Previously where developments have been proposed of this size and within this part of the DEPZ, the Emergency Planning consultation response has been to not object. However, following more recent planning appeals, and concerns raised by response partners about the burden placed upon the Off-Site Emergency Plan from further development, this stance has changed.

This position is consistent with that detailed in the recent appeal decision: APP/H1705/W/23/3326959, 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. Whilst all applications should be considered on their own merits, there are fundamentals, which are applicable to this application, such as:

“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 additional demand for emergency services, at the time of an incident, would exacerbate an Emergency Plan already under tension resulting in substantial threat to its delivery affecting the safety of the public. This conflict accords with the objectives of the Framework for planning decisions to promote public safety and take into account wider security and defence requirements by, among other matters, proportionate steps to increase resilience and ensure public safety and security.”

The Radiological Impact Assessment refers to the Kingfisher Close appeal, which should not be used as supporting evidence. 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. 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. 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. 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.

There are further recent appeals, all with increases in population than this proposed 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)

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

The assessment also refers to APP/W0340/W/22/3312261 ‘the Hollies’ to evidence their case. However, they have omitted that 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.”

The Hollies was an allocated site prior to REPPiR 19, and expansion of the DEPZ, this site is not.

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. This has been attached to this response.

The applicant has not offered any sufficient mitigation for the introduction of an additional population to the DEPZ. As such, the proposal is contrary to the requirements of Policy TB04 of the MDD Local Plan and section 8 of the NPPF.

Conditions & Reasons (if required)

Date:	20/08/2025	Signed:	Harry Williamson
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UK Health
Security
Agency

Advice to West Berkshire Council on radiological impact assessments

Related to planning applications around the AWE sites of Burghfield and Aldermaston

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1 Purpose

This report has been commissioned by the West Berkshire Council as the lead emergency planning Local Authority and as part of the UKHSA existing REPPIR advisory service to assist them, and other Local Authorities, when they are consulted on land use development applications which contain radiation risk assessments and also when they object to planning applications or appear at planning appeals. Whilst it was commissioned by West Berkshire Council, the advice relates to radiological impact assessments submitted to West Berkshire Council, Basingstoke and Deane Borough Council and Wokingham Borough Council to support planning applications around the AWE sites of Aldermaston and Burghfield.

Although there are numerous planning applications that documents covered by this report relate to, the arguments made in the supporting assessments are similar. The purpose of this report is to draw out and discuss the main points related to the health risks from exposure to radiation into one document.

2 Role of UKHSA in providing advice

UKHSA provides advice on public health protection in the event of radiation emergencies. The Health and Social Care Act (HSCA) 2012 outlines the provisions for radiation protection functions for England (Section 11) and the devolved administrations of Scotland, Wales, and Northern Ireland (Section 58). Public Health England (PHE) was the appointed agency responsible for the Secretary of State for Health and Social Care's duties under the HSCA from 2013-2021. PHE was superseded by the UK Health Security Agency (UKHSA) in 2021. In accordance with the HSCA, UKHSA must comply with the relevant legal framework for emergency preparedness including the Civil Contingencies Act (CCA) 2004. The CCA forms the legal basis for emergency preparedness in the UK and lists UKHSA as a Category 1 responder. As such, UKHSA's responsibilities in radiation Emergency Preparedness, Response and Recovery (EPRR) extend to cover the UK in its entirety.

The Radiation, Chemical and Environmental Hazards Directorate (RCE) is one of UKHSA's Specialist Services and is the focal point for independent advice on health risks from exposure to radiation. Although RCE's expertise relates to radiation protection advice, its advice on Public Health Protection in Radiation Emergencies [1] acknowledges the importance of non-radiological issues concerning decisions on withdrawal of the urgent protective actions of sheltering-in-place and evacuation and these are also discussed.

Regulation 7 of the Radiation (Emergency Preparedness and Public Information) Regulations 2019, known as REPPIR 2019, requires site operators to provide the Local Authority in which their site is based with a consequences report which sets out any minimum geographical extent from the premises, that should be covered by the Local Authority's off-site emergency plan for the site.

Local authorities may request advice from UKHSA RCE in support of their interpretation of this consequences report as an input into the process of determination of the Detailed Emergency Planning Zone (DEPZ) and other arrangements included in the Off-site Emergency Plan. Under Regulation 11, West Berkshire Council is required to consult UKHSA on the Off-site Emergency Plan (OSEP) and other matters affecting the overall public health response. UKHSA provide ongoing advice to West Berkshire Council as provided for in the REPPiR legislation.

In 2019, West Berkshire Council requested that PHE provide advice on the consequences reports for the Atomic Weapons Establishment (AWE) sites Aldermaston and Burghfield. Based on the information provided by AWE in the consequences reports for the Aldermaston and Burghfield sites and the supplementary information provided by email, PHE recommended that West Berkshire Council should consider adopting the recommendations of retaining the existing DEPZ distance for the Aldermaston site and implementing the distance of 3160 metres radially as a minimum for the Burghfield site with sheltering in both cases being the protective action. However, PHE did not have details of the dose assessment analysis on which AWE's consequences reports are based and therefore was not able to undertake any confirmatory calculations. PHE's comments were based on the contents of the Consequence Reports alone and were provided under the duties to provide advice to Local Authorities on specialist matters pertaining to public health under the Health & Social Care Act 2012.

3 Main Comments

There are many similar comments made in the various reports often called but not always 'radiation risk assessments' which have been reviewed relating to radiological health impacts. The main UKHSA comments on these documents are that any off-site nuclear emergency with a release of radioactive material cannot be considered to be of "low consequence" or "no material risk" especially for those living within the DEPZ. The documents frequently refer to sheltering only being required whilst the plume is passing, and no longer-term relocation being required. This cannot be stated as a certainty and it is likely if there is an off-site release of actinides such as plutonium, there will be a significant impact on responders providing both environmental and people monitoring even if only to provide reassurance. Decisions on extension, withdrawal or change of urgent protective actions during an off-site nuclear emergency will be taken by the multi-agency coordination groups responding to that emergency based on information available to them. This information can take time to gather and includes data on the extent and level of residual contamination, and therefore risk, once any release has been terminated. There will be a need to consider any non-radiological impacts such as on the mental health of the affected population and the need to provide reassurance to individuals in the area.

The following sections provide a more detailed response to the findings in the reports which have been reviewed; in particular, where the reports' authors have expressed findings or views which are not aligned with those of UKHSA.

3.1 Short-term versus longer-term doses

The AWE Aldermaston and Burghfield consequences reports [2], [3] both state that the primary concern for early response decision-making to radiation emergencies involving possible accidents only merits consideration of the first-pass inhalation dose for exposure to actinides. The purpose of the consequences reports is to use the results of the consequence assessments to determine the recommended minimum geographical extent for the detailed emergency planning zone, the requirements for urgent protective action, and where applicable the recommended geographical extent for the outline planning zone. However, the consequences reports do not provide information about the longer-term doses. When advising on the health protection of the local population following an emergency, UKHSA advisors will be considering risks from longer-term pathways such as resuspension (this is the inhalation of radioactive material that is resuspended into the air). It should be noted that the inhalation during the initial release is short duration whereas inhalation due to resuspension presents a much longer duration, albeit less intense, exposure situation. Doses from resuspension are a factor for decision making for the relaxation of urgent protective actions and in recovery from an emergency.

The radiological impact assessments e.g. for the construction for the 148 Dwellings at Church Lane [4] refer to these first-pass inhaled doses given AWE Aldermaston and Burghfield consequences reports and argue that the doses are of “only limited radiological significance and would not justify disruptive mitigation activities in the short or longer term”. For developments within the Detailed Emergency Planning Zone (DEPZ), it is stated that “The proposed development would also be so far from AWE Burghfield that neither urgent nor subsequent evacuation would be required, even for extreme accidents”. It is correct to say that the doses considered in the consequences report at distances greater than 3160 metres are below the levels which would correspond to the justification of urgent protective actions by application of Emergency Reference Levels (ERLs) [1]. However, ERLs are for short-term urgent protective actions and not 'longer' term actions. Decisions on protective actions for the longer term (more than a few days) would also take into consideration non-radiological criteria and therefore would be a multi-agency decision.

The consequences report is used to determine the DEPZ for the protective actions and the circumstances at the time of an emergency may differ from those within the report. It is not recommended to base the shape of the DEPZ on prevailing weather conditions, as events may occur in any weather condition or direction [5]. These differences are one of the factors which can influence the decision-making process at the time of an emergency.

In a report for the Appeal Statement against refusal of Full Planning Permission for Land Rear Of 1-9 Shyshack Lane, Baughurst, Tadley, Hampshire for 3 dwellings [6] it states that “Doses resulting from the inhalation of, or cloud dose from the resuspension of radioactivity that was previously deposited onto surfaces. It can be shown that the dose in the year following the accident is likely to be less than 1% of the initial inhalation dose.”

UKHSA does not know if this is an assumption by Katmal or based on information provided by AWE but it should be noted that resuspension factors can vary by a factor of 100 from rural conditions to urban conditions where there is regular disturbance by vehicular traffic and pedestrians [7].

In the report for Appeal against refusal of full planning permission for Land To The Rear Of The Hollies, Reading Road, Burghfield Common [8] it states that “Before the dust cloud arrives and after it departs there is no material dose uptake to be averted by protective actions and no material risk. Almost all the dose uptake occurs during plume transit.”

It should be noted that during an emergency there is a need to assess what has been released and deposited and thus what risk remains from resuspended material and other pathways of exposure. Collecting this data takes time as does the subsequent analysis and formulation of advice to decision makers. It cannot be said with certainty that, should a release occur, there is no material risk. Whilst the instantaneous air concentration due to resuspension is lower than that during the plume phase, the duration that resuspension presents a risk is far longer and thus may well present a significant hazard which requires relocation of parts of the population from contaminated areas. This would be subject to decisions at the time of the emergency.

3.2 Supporting vulnerable individuals

The radiological impact assessments e.g. construction for the 148 Dwellings at Church Lane [4] address whether the proposed development would place an additional burden on first responders and carers in respect of dealing with medical emergencies and addressing the needs of vulnerable individuals. It states that “in most accident scenarios, sheltering would either not be required at the location of the proposed development (although it might be initially advised for everyone within the DEPZ) or would only be required for between a few hours and two days. Therefore, even if visits were discouraged during the sheltering phase, this would be only a short hiatus.” “...it would be important to emphasise to carers that entry into areas with low levels of radioactive contamination would not pose a threat to their health. This is a general aspect of their training and does not have any specific implications for the acceptability of the proposed development.” It was also stated that “Because of the low doses that would arise following an initial explosive release, there should be no issue with carers visiting the proposed development soon after an accident.”

It should be noted that whilst sheltering is recommended to not exceed 48 hours, decisions about ongoing protection of the public who have been requested to shelter will be made by a multi-agency group at the time of the emergency taking non-radiological factors into consideration. Lifting of sheltering does not equate to no risk and workers entering a contaminated area post emergency will need to undertake a risk assessment. Their entry may also require the appointment of a Radiation Protection Advisor who may advise that visits should not take place. As such it cannot be stated with certainty that there would “only be a short hiatus” in service provision. The assessment of worker exposure, provision of personal protective equipment and any training would be the employer's legal responsibility and would require consultation of an appointed Radiation Protection Advisor. This report cannot be used in place of that requirement to state that there is no risk to health and no issue with carers visiting the proposed development soon after an accident. A radiation emergency will likely result in delayed service provision to vulnerable individuals which could result in them not received the required level of care.

3.3 Sheltering and relocation advice

In radiological impact assessment for the construction for the 148 Dwellings at Church Lane [4] it states that “in practice, sheltering would typically only be required until the contaminated plume had passed.”

It should be noted that advice to continue to shelter would remain in place whilst the extent and levels of residual contamination hazard are determined and for up to 48 hours. UKHSA would not advise lifting of sheltering immediately after the plume has passed. Upwind areas will still require positive confirmation that they are not contaminated as local weather

conditions do not always match prediction models. The scale of the release may be different to the one used in the consequences report so it will take time to confirm the impacts. Monitoring of residual contamination levels and assessment of risks to the public from this contamination takes hours to days to provide sufficient data to inform decision making on lifting of sheltering. As such a decision may be made to advise members of the public move out of any area that requires further monitoring and possible decontamination.

In the summary proof against the appeal against refusal 2 of full planning permission for Land To The Rear Of The Hollies, Reading Road, Burghfield Common [8] it states that “longer-term relocation will not be necessary for those living on the site.” It is also stated that “it is likely to be possible to advise people that they can break shelter and return to near normal life (with exceptions of not harvesting and eating food that was outside during plume transit) within an hour or two of the alarm”. In a footnote it stated that “It has to be recognised that the decision-making process will probably take longer to signal the end of shelter as there are issues of public perception and the natural caution of the decision makers.”

It should be noted that this cannot be stated with certainty that sheltering will only last a few hours and that no relocation would be required. The protective actions in the off-site plan (sheltering) provide some protection from the inhalation of radioactive material in the plume. Decisions on relocation, whether temporary or permanent, would be taken by multi-agency responders at the time of an emergency taking empirical data on what has happened into account.

3.4 Impact on emergency services

In the radiological impact assessment of construction for the 148 Dwellings at Church Lane [4] it states that “Furthermore, the emergency services could respond to a medical emergency at the proposed development as they would normally.” It concludes that “there is no significant impact on responders under the emergency plan; and no adverse impact on the access of emergency services to the AWE Burghfield site.”

In the statement on the appeal against refusal of full planning permission for Land To The Rear Of The Hollies [8], it states “The increased number of inhabitants of the DEPZ will not put a material additional strain on the resources of the off-site plan”.

In the report on the proposed second phase of developing Stanbury House [9] it states that “It seems reasonable to assume that the creation of more housing at the outer edge of the UAPZ does not increase the resources the local authority requires to understand the AWE(B) risk assessment and to prepare a functional specification and resource needs analysis for the off-site plan.”

It should be noted that any response in an area affected by an off-site nuclear emergency will be subject to advice issued by the appointed Radiation Protection Advisor (RPA) for the

emergency service. UKHSA is the RPA for NHS Ambulance services and we can state that 'normal' response is very unlikely. As discussed in Section 4.5 it should be noted that monitoring of any additional population for radioactive contamination in the DEPZ will add to the burden upon responders.

3.5 Environmental Monitoring after a radiation emergency

In the radiological impact assessment for the construction of 148 Dwellings at Church Lane [4] it states that “The proposed development would not increase the number of samples required because the aim would not be to provide a detailed map of contamination, but rather to demonstrate that levels were low over the whole area of interest.” It is likely that results from the dispersion modelling and limited monitoring would mean that no further monitoring would be required. At the site of the proposed development, it is projected that the dose rates that would arise after the passage of the initial plume would be so low that decontamination of the environment would not be required.”

It should be noted that UKHSA leads on monitoring coordination for radiation emergencies. Previous emergencies have demonstrated the need to have a suitably large volume of measurements to have sufficient statistical evidence of levels. If developments result in additional vulnerable sites such as schools or care homes, then this may require additional locations to be considered as part of a monitoring strategy.

Environmental monitoring is not a 'one-off' activity and monitoring would need to be continued for years after an emergency. Decisions on recovery actions are made by a multi-agency group and consider many factors other than radiological data. As such it is not correct to state that no decontamination would be required.

3.6 People Monitoring after a radiation emergency

In the radiological impact report on the construction of 148 Dwellings at Church Lane [4] it states that “the application proposal has no material impact on the resources required in the event of implementation of the off-site emergency plan for AWE Burghfield”.

It should be noted that there is no comment about the additional burden placed upon responders by the potential need to monitor any additional population for radioactive contamination. It takes approximately 20 minutes to monitor one person at a Radiation Monitoring Unit. In the case of 148 Dwellings at Church Lane [4], assuming 2 people per dwelling, this equates to an effective additional 98 hours of monitoring time.

4 References

1. PHE, *Public Health Protection in Radiation Emergencies*, in *PHE-CRCE Series*. 2019, Public Health England, Chilton (UK).
2. AWE, *AWE Aldermaston Consequences Report*. 2019.
3. AWE, *AWE Burghfield Consequence Report*. 2019.
4. Thorne, M.C. and K.I. Pearce, *Radiological Impact Assessment of the Construction of 148 Dwellings at Church Lane, Three Mile Cross, Wokingham, including implications for the Off-site Emergency Plan*. 2023.
5. Bexon, A.P., et al., *REPPIR 2019 consequence assessment methodology*, in *PHE-CRCE Series*. 2019, Public Health England: Chilton (UK).
6. Katmal, *Appeal Statement on land rear of 1-9 Shyshack Lane, Baughurst, Tadley, Hampshire for erection of 3 dwellings REF:22/02905/FUL*. 2023.
7. Wellings, J., et al., *Estimation of radiation doses from inhalation of resuspended materials in emergency situations*, in *PHE-CRCE Series*. 2019, Public Health England: Chilton (UK).
8. Pearce, K.I., *Statement on refusal 2 on land to rear of the Hollies, Reading Rd, Burghfield Common for erection of 32 dwelling*.
9. Katmal, *Resource Requirements of JEPU AWE off-site Emergency Plan with regard to the proposed second phase of developing Stanbury House*.

About the UK Health Security Agency

UKHSA is responsible for protecting every member of every community from the impact of infectious diseases, chemical, biological, radiological and nuclear incidents and other health threats. We provide intellectual, scientific and operational leadership at national and local level, as well as on the global stage, to make the nation health secure.

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Version 1

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Published: August 2024

Quality statement:

This work was undertaken under the Radiation Assessments Department's Quality Management System, which has been approved by Lloyd's Register Quality Assurance to the Quality Management Standard ISO 9001:2015, Approval No: ISO 9001 - 00002655.

This work was commissioned by West Berkshire Council



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