

Emergency Planning Summary

CD 20.13

Town and Country Planning Act 1990

Section 78 appeal against the refusal of planning permission

Witness: Carolyn Richardson, BSc Hons, CIEH

Subject of Evidence: Emergency Planning

Appeal: APP/W0340/W/22.3312261

Site: Land to the rear of The Hollies, Reading Road, Burghfield
Common, Reading, RG7 3BH

Proposal: Full planning permission for the erection of 32 dwellings
including affordable housing, parking and landscaping. Access
via Regis Manor Road

Date: June 2023

Council Reference: 22/00244/FULEXT



West Berkshire
C O U N C I L

Summary

Name: Carolyn Richardson

May 2023

Town and Country Planning Act 1990
Section 78 appeal against the refusal of planning permission

Applicant: Carolyn Richardson, 82c Lion, CIEH

Subject of Dispute: Emergency Planning

App No: AP/23/0010/23/001

Site: Land to the rear of the former, Redwood Road, Burghfield

Common Usage: 100% 201

Proposal: Full planning permission for the erection of 2 dwellings including attached housing, parking and landscaping. Access via Redwood Road

Date: June 2023

Council Reference: 230024/FUL/EXT

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Summary

- 1.1 My name is Carolyn Richardson.
- 1.2 I have set out in my Proof of Evidence (PoE) Introduction (Section 2) my qualifications, job role and my involvement with the Atomic Weapons Establishment (AWE) sites since 1998.
- 1.3 My evidence relates to the second reason for refusal. Mr Lyttle addresses the policy of CS8 which refers to Off Site Emergency Planning and Mr Shepherd refers to that policy and circumstances that create material considerations in this matter. Our evidence should be read together. I don't address questions on planning policy or law.
- 1.4 I shall briefly explain why and how emergency planning is material to this appeal.
- 1.5 The Radiation (Emergency Preparedness and Public Information) Regulations in 2019 changed from the 2001 version due to an evolution in risk assessment by the UK Government after the Fukushima Daiichi Nuclear Power Plant disaster (2011).
- 1.6 These changes situated the appeal site within the areas around the AWE Burghfield (AWE (B)) known as the Urgent Protective Actions (UPA) area and consequently the Detailed Emergency Planning Zone (DEPZ) area.
- 1.7 The map shown on P23 of my PoE shows the location of AWE (B) and the 16 equal sectors, identified alphabetically, A to R (with no I or O).
- 1.8 The map on P22 and P43 (Para 9.13) of my PoE shows the appeal site is situated in Sector M within the area identified in the AWE (B) Consequence Report requiring Urgent Protective Actions, within the DEPZ to the west of the AWE (B) site.
- 1.9 The tables on P23 of my PoE show that prior to the changes in legislation and within the previous DEPZ (the 'Land Use Consultation Zones') set before March 2020 there were 3 residential units within sector M.

- 1.10 From March 2020 as a result of the legislative changes the UPA 'extended' in diameter and as a result the DEPZ also extended outwards with the associated sectors into the new extend of the current DEPZ.
- 1.11 As stated in 1.10 it can be seen from the map on P23 the extent of sector M which includes the appeal site and substantial existing residential development.
- 1.12 As a result of the changes to the extent of sector M the demographics have significantly changed from 3 residential units to 2566 residential units in M, plus 141 commercial units and 7 'vulnerable' sites (3 care homes, 4 nurseries and schools). An increase of c. 85,433% in residential units only.
- 1.13 Within the whole of the DEPZ the number of residential units also increased from a total of 89 prior to March 2020 to 7738 and increase of c.8,594% in residential units only.
- 1.14 The ONR objected to this application because it was not then satisfied that the OSEP could accommodate the population of the appeal accommodation and therefore the OSEP would not be adequate. Since then, the ONR's evidence confirms the OSEP to be "adequate" at this time. That the ONR expressed its first and then second view, suggests the OSEP to be borderline adequate.
- 1.15 As stated in my PoE 7.12 and in 1.37 and Appendix B of my rebuttal, further applications have been permitted (prior to March 2020) which are still valid but not built out yet. Therefore the numbers will increase further. This application seeks permission for 77 further residents within the DEPZ. The ONR and AWE are present at this Inquiry to show the Secretary of State their real concern at any further residential development in the DEPZ and its consequences for AWE as well as the proposed residents.
- 1.16 CS8 seeks to ensure public safety, by reference to an ONR objection, and refers to both Off-Site Emergency Planning and changes in demographics in its reasoned justifications, and does not limit a Plan to that under the 2019 Regulations.
- 1.17 The Consequence Report clearly states the hazards, the area at risk and the urgent actions to be taken.

- 1.18 As CS8 describes, assurance of public safety OSEP is sought. However, when the plan is triggered by the occurrence of a radiation emergency from AWE (B), with off-site consequences, the precise nature of the incident cannot be known in detail.
- 1.19 The OSEP describes a plutonium hazard including an increased risk of cancer for affected persons that would include the Appeal site residents. (PoE Appendix 5, Pages 19 – 24)
- 1.20 Once triggered the OSEP requires actions to be undertaken. What protective actions will depend on the nature of the incident (P72 OSEP).
- 1.21 The Consequences Report describes the basis of the hazard and the recommended outcome if a hazard is realised off-site. The recommendation is to shelter with 25mins of that realisation. The Consequences Report cannot advise on how shelter is to be effected. This is because the 2019 regulations allocate off-site plan formulation to this Council. 'What does shelter mean?' It means that where so ever the individual is within the DEPZ the person must then immediately in shelter. In practical terms a child must remain in the school building, a parent must remain in their place of work (whether inside or outside the DEPZ), a different parent working from home, must remain there. Therefore immediate societal fragmentation occurs within the DEPZ. The parent at home will want to ensure the child gets home, the parent at home wants to go home.
- 1.22 Sheltering insitu within the DEPZ has a limit and therefore subsequent evacuation based on data will be necessary. How long term this may be for is an unknown. The OSEP requires displacement of people within the DEPZ to locations outside of it so as to ensure public safety. Other countermeasures are detailed in the OSEP including longer term food restrictions and temporary and permanent relocation all which is within.
- 1.23 In parallel with sheltering, prioritised people assurance monitoring and decontamination would take place which would take time as stated in my PoE.
- 1.24 Actions are set out in the OSEP in detail in P72 to 81 but include:
- a. Shelter in situ (Homes/Workplaces/Schools)

b. Immediate Evacuation and sheltering outside the DEPZ

c. Subsequent evacuation and shelter outside the DEPZ

d. Restrictions on foods

1.25 This will result in movement of people to outside the DEPZ requiring shelter and for sheltering to continue for a long undefined period pending certification that the persons home and work place is safe.

1.26 The radioactive material causing the contamination from the incident would require to be cleaned up on a priority basis. This would require both technically and for peace of mind, a number of recovery activities to be undertaken including:

a. decontamination of residential and commercial properties affected inside the DEPZ. This can take a long time to undertake, and longer if more properties;

b. food stuffs to be disposed of and alternative supplies to be sourced;

c. farmland and other open spaces to be recovered to maximum permitted levels;

d. monitoring and decontamination of people. Within 24hrs one such radiation monitoring unit would be available. One unit can process 200 people per day. Within the DEPZ there are more than 18000 people therefore this would equate to 92 days/ 3 months simply to monitor people. Understandably people awaiting their monitoring will be fearful and concerned.

1.27 Throughout the recovery period it cannot be said that relocated people would be allowed to return home.

1.28 Understandably they would have a real fear and concern for their health and well-being, including the long term physical and mental health for example increased incidents of cancer.

1.29 Whilst the focus is on controlling the incident and the immediate public safety a recovery strategy would be developed which would include environmental decontamination. It can be expected that a person returning to their home would want

its safety assured by certification the scope of REPPIR. This would be at an unknown point in time when suitably 'clean' as per the agreed recovery strategy.

1.30 Whilst evacuation can only be enforced at times of terrorism, common sense says the anticipation of plutonium coverings ones property is encouragement enough to leave. Potentially large scale controlled evacuation and be logistically challenging.

1.31 If the appeal is allowed the proposed homes can anticipate to be empty for a potentially extended period of time triggered by an incident covered by the 2019 regulations, by the Councils OSEP under these legislations and, as the incident will have generated a major incident the regulations dove tail into the emergency planning legislation, the Civil Contingencies Act 2004 also. CS8 covers public safety, Schedule 7 of REPPIR 19 also sets out factors relating to public safety. The impact on public safety and the OSEP in the event of an emergency. Indeed the AWE OSEP is not limited to radiological emergencies, but covers a range of incidents based on learning from the 'explosives' incident in 2010, and is a constantly evolving plan.

1.32 The practical consequences are obvious because of the increases in numbers to over 2556 in sector M needing to be shelter from the previous numbers.

1.33 The OSEP as a whole has to accommodate approx. 18,000 people within the DEPZ, of which 7500 are in sector M. That demographic step change results in a plan that is adequate to ensure public safety for residents but barely so as indicated by the ONR objection.

1.34 The cumulative impact of the appeal resident population therefore arises in the real context of that recent demographic step change. That the edge of adequacy has already been reached as shown by ONR and AWE evidence and presence here.

1.35 It is nonsensical to simultaneously propose permanent residential accommodation and place them, in the face of an action, if triggered, that would require relocation for an extended period. During that period the local community would remain fragmented.

1.36 Section 5 addresses the historical background and legislative requirements.

- 1.37 Section 6 of my PoE addresses the DEPZ process within which the Appeal site is located. The designation decision was unsuccessfully challenged by Crest Nicholson, the neighbouring developer.
- 1.38 Sections 7, 8, 9 & 10 of my PoE details the background and implications of the appeal site in relation to the legally required AWE Off-Site Emergency Plan. The Plan ensures the correct experts are available to support the response and guidance is available to assist the initial response that would, for example, AWE as the particular site operator and UK HSA. Contamination requires to be removed. People and Environmental monitoring would be required and takes time and resources, subsequent evacuation of residential units is likely as a result of the time frame to undertake monitoring, which cannot start in earnest until the situation at AWE is under control, public assurances will be challenging. Clean up and recovery will be challenging and extended.
- 1.39 In Sections 9 & 10 of my PoE I address specific elements of the response and the recovery - 'aftermath' focusing not only on the impacts immediately but undoubtedly the longer term restrictions prior to returning home following the approvals being in place.
- 1.40 Until a radiation emergency occurs, it is not realistic to suggest the OSEP is perfect. It is an adaptive framework flexing according to the situation then known at the time including the scale but only up to a point because of the complex modelling of the AWE and ONR that tests its subsisting adequacy to ensure public safety.
- 1.41 Plutonium, unlike a fire or flood, cannot be seen, smelt or heard. Its invisible nature undoubtedly will add to the extreme stress across the population in the DEPZ, if not beyond also. Understandable, real and genuine fear and concern is likely to arise in the affected population. The fear and concern would include whether an individual was contaminated, or the increased risk of cancer in their life or whether their homes are really safe to return to or not. To suggest otherwise is fanciful.
- 1.42 I do reject the distorted picture painted by the appellant that a radiation emergency can be ignored. It cannot. This Council must respond to it, when triggered, under its Plan.
- 1.43 Nor is there a one Plan fits all situation and radiation element will undoubtedly make response execution more complex.

1.44 In section 11 of my PoE I address how Emergency Planning is consulted and responds to planning applications.

1.45 If the appeal was allowed this would result in compromising the public safety of the appeal site for residents, and others, as well as for the AWE itself.

1.46 Finally the appellant's suggests that the addition of 32 homes, 77 people, would make no difference. I disagree. It is non-sensical to expose any future residents to the public health effects of increased cancer incidence, relocation for an extended period, and to social fragmentation as well as genuine fear and concern arising from plutonium contamination of their person, homes and loved ones.